

BEFORE THE  
**FEDERAL COMMUNICATIONS COMMISSION**  
WASHINGTON, D.C. 20554

In re Petition of:	)	MB Docket No. 12-1
	)	
Entravision Holdings, LLC	)	
	)	
For Modification of the Television Market	)	CSR-_____
For Station WJAL(TV), Silver Spring, Maryland	)	
	)	
Facility ID 10259	)	
	)	

To: The Secretary  
Attn: Chief, Media Bureau

**PETITION FOR SPECIAL RELIEF**

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## SUMMARY

In the instant Petition for Special Relief, Entravision Holdings, LLC demonstrates that, pursuant to the market modification factors contained in Section 614(h)(1)(C)(ii) of the Communications Act, the cable communities served by Comcast of Maryland, LLC, Comcast of Potomac, LLC, Comcast of Virginia, Inc. and Comcast of the District, LLC in the Washington, D.C. DMA should be added to the television market of Station WJAL(TV), Silver Spring, Maryland.

In a 2003 decision, the Commission removed the Comcast Communities from WJAL's market. Since that time, every facet of WJAL's operation has changed. Most significantly, WJAL was a successful bidder in the recent Incentive Auction and it is now the sharee station in a channel sharing arrangement with Station WUSA(TV), Washington, D.C. Pursuant to this arrangement, WJAL has relocated its transmission facilities to the WUSA transmitter site located in Washington, D.C. and changed its community of license to Silver Spring, Maryland. Analysis of the statutory market modification factors in light of these changes shows that the Comcast Communities properly belong in the Station's market.

With respect to the historical carriage factor, Comcast carries WJAL's channel sharing partner, WUSA, throughout its communities. In fact, Comcast carries every full-power television station broadcasting from a transmitter site located within the District of Columbia and its immediate surrounding areas. The Commission has previously recognized carriage of co-located stations in a particular community as evidence of the petitioner station's nexus with that community, and noted that petitioner station's lack of carriage puts it at a competitive disadvantage in the market. The Commission also considers station carriage by competitors in the relevant communities, or carriage in communities that overlap with or are adjacent to the

subject communities as evidence of market ties between the station and the subject community. WJAL is presently carried throughout the Washington, D.C. DMA by DISH Network, including in the areas constituting the Comcast Communities, and on Comcast systems in communities adjacent or near to Comcast Communities at issue in this proceeding.

Additionally, the Commission has long recognized that new stations may not have a history of carriage and that this factor is thus of limited relevance in market modification cases involving such stations. While WJAL is not new to broadcast television service, its relocation to a transmitter site in Washington, D.C., where it did not previously provide over-the-air service, and its community of license change to Silver Spring, Maryland in the heart of the Washington, D.C. DMA, render it analogous to a new station for market modification purposes. The 'new station' characteristics of WJAL's post-auction operation are also relevant to the fifth statutory market modification factor, viewership. For purposes of this factor, as with historical carriage, the Commission has routinely stated that lack of viewership is not a meaningful market modification factor in the context of new stations. Entravision submits that the WJAL's low to nonexistent viewership numbers across the Washington, D.C. market reflect its historical position on the periphery of the market, and that such numbers are not probative of the Station's local market nexus from its new operation from Silver Spring/Washington, D.C. In any event, with regard to historical carriage and viewership, the Commission has previously held that an insufficient showing under these criteria is offset by a station's status as a new station, or by recent changes in signal strength and coverage capabilities. To the extent the Commission finds the Station's historical carriage and viewership credentials lacking, the Commission should apply the same offsets here.

As for the crucial second statutory market modification factor, local coverage and service, it is beyond dispute that WJAL covers the Comcast Communities with the Station's 36 dBu noise-limited contour. With respect to distance considerations, the Station's geographic proximity to the Comcast Communities is in keeping with Commission precedent, whether measured from the Station's transmitter site or its community of license. WJAL's community of license, Silver Spring, Maryland, and the Station itself are united to the broader metro D.C. area, including the Comcast Communities, by common economic, social, and cultural ties. These ties, together with geographic proximity and the Station's robust signal coverage should outweigh any deficits the Commission finds in the Station's current local programming. Entravision hopes to improve the Station's local programming in the future, and this commitment together with the Station's strong geographic proximity and signal coverage showing support weighing the local service factor in WJAL's favor.

Under Commission precedent, the third statutory market modification factor, consumers' access to in-state broadcast signals, and the fourth factor, the local service provided by other stations currently carried by Cox and Comcast, should simply drop out of the market modification analysis in the instant proceeding.

Much has changed since WJAL's previous market modification decision was decided. As set forth herein, these changes evidence WJAL's clear market nexus with the Comcast Communities, and demonstrate that the subject communities rightfully belong in the Station's market.



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**PETITION FOR SPECIAL RELIEF**

Entravision Holdings, LLC (“Entravision”), the licensee of Television Station WJAL(TV), Channel 9, Silver Spring, Maryland (Facility ID: 10259) (“WJAL” or the “Station”), by its attorneys and pursuant to Section 614 of the Communications Act of 1934, as amended (the “Communications Act”), and Section 76.7(a) of the Commission’s Rules, hereby submits this Petition for Special Relief (“Petition”), requesting modification of the Station’s market to include, for purposes of carriage of the Station, those communities in the Washington, D.C. Designated Market Area (“DMA”) served by the following cable operators:

- Comcast of Maryland, LLC, the operator of cable television systems located in Charles County, St. Mary’s County, Prince George’s County, and Calvert County, Maryland;<sup>1</sup>

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<sup>1</sup> Entravision seeks to add the following communities served by Comcast of Maryland, LLC’s cable systems in the Washington, D.C. DMA to the Station’s market:

- Comcast of Potomac, LLC, the operator of cable television systems in Montgomery County, Maryland and Arlington County, Virginia;<sup>2</sup>
- Comcast of Virginia, Inc., the operator of cable television systems in Fairfax, Arlington, Loudoun, Prince William, Stafford, and Spotsylvania Counties (together with independently incorporated cities and towns therein), Virginia;<sup>3</sup> and

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(i) Bryans Road (MD0196), Charles (MD0178), Cobb Island (MD0267), Indian Head (MD0177), La Plata (MD0352), La Plata Town (MD0176), St. Charles (MD0033), and U.S. Naval Ord. Station-Indian Head (MD0351), Waldorf (MD0263) and St. Mary's (MD0279) (the "Charles County and St. Mary's County System"); (ii) Hyattsville (MD0140), Bladensburg (MD0141), Berwyn Heights (MD0142), College Park (MD0143), Cottage City (MD0144), Edmonston (MD0145), Glenarden (MD0146), Landover Hills (MD0147), Mount Rainier (MD0148), North Brentwood (MD0149), Riverdale (MD0150), University Park (MD0151), Prince George's (MD0163), District Heights (MD0165), Upper Marlboro (MD0167), New Carrollton (MD0171), Prince George's (N) (MD0172), Greenbelt (MD 0173), Cheverly (MD0174), Seat Pleasant (MD0181), Fairmont Heights (MD0182), Capitol Heights (MD0183), Morningside (MD0184), Forest Heights (MD0185), Andrews AFB (MD0186), Bowie (MD0200), Laurel (MD0201), Brentwood (MD0220), Colmar Manor (MD0221), Takoma Park (MD0383), Beltsville (MD0388), Seabrook (MD0389), Lanham (MD0390), and Montpelier (MD0391) (the "Prince George's County System"); and (iii) Calvert (MD0250), Chesapeake Beach (MD0255), and North Beach (MD0256) (the "Calvert County System").

<sup>2</sup> Entravision seeks to add the following communities served by Comcast of Potomac LLC's cable systems in the Washington, D.C. DMA to the Station's market: (i) Gaithersburg (MD0057), Rockville (MD0222), Chevy Chase (MD0223), Silver Spring (MD0224), Washington Grove (MD0225), Takoma Park (MD0226), Somerset (MD0227), Poolesville (MD0228), Barnesville (MD0229), Brookville (MD0230), Garrett Park (MD0231), Glen Echo (MD0233), Kensington (MD0234), Laytonsville (MD0235), Montgomery (MD0236), Chevy Chase (MD0274), Chevy Chase Sect IV (MD0275), Chevy Chase Sect V (MD0276), Chevy Chase Village (MD0277), Germantown (MD0340), Burtonsville (MD0341), Potomac (MD0342), Boyds (MD0343), Wheaton (MD0344), Derwood (MD0345), Olney (MD0346), Cabin John (MD0347), Bethesda (MD0348), West Bethesda (MD0349), North Chevy Chase Village (MD0465), Chevy Chase View (MD0466), Martins Additions Village (MD0467), and Chevy Chase Village Section 3 (MD0472) (the "Montgomery County System"); and (ii) Arlington (VA0108) (the "Arlington County System").

<sup>3</sup> Entravision seeks to add the following communities served by Comcast of Virginia, Inc.'s cable systems in the Washington, D.C. DMA to the Station's market: (i)

- Comcast of the District, LLC, the operator of a cable television system in the District of Columbia.<sup>4</sup>

In support thereof, Entravision states as follows.

## **I. BACKGROUND**

### **A. The Station**

WJAL is an independent, minority-controlled television station that has long provided family-friendly programming to viewers in the Washington, D.C. DMA. WJAL was formerly licensed to Hagerstown, Maryland, and broadcast from a transmitter site located several miles northwest of Hagerstown, in Mercersburg, Pennsylvania.<sup>5</sup> In 2017, WJAL was a successful bidder for a license relinquishment in the Incentive Auction.<sup>6</sup> It is now the sharee station in a channel sharing arrangement with Station WUSA(TV),

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Prince William (ETN) (VA0019), Quantico (VA0173), Prince William (VA 0241), Quantico (VA0242), Fort Belvoir (VA0267), Dumfries (VA0280), Lake Ridge (VA0287), Manassas Park (VA0315), Manassas Park (VA0316), Prince William (W) (VA0329), Manassas (VA0362), Occoquan (VA0377), Manassas (VA0398), Gainesville (VA0432), Haymarket (VA0433), Dale City (VA0595), Triangle (VA0596), Woodbridge (VA0597), Prince William (VA0616), Prince William (E) (VA0617) (the “Prince William County and Fairfax County System”); (ii) Reston (VA0046) (the “Reston – Fairfax County System”); (iii) Alexandria (VA0220) (the “Alexandria – Arlington County System”); (iv) Fort Myer (VA0373) (the “Fort Myer – Arlington County System”); (v) Leesburg (VA0255), Loudoun (VA0332), Purcellville (VA0567), Middleburg (VA0568), Round Hill (VA0569), Hamilton (VA0570), and Lovettsville (VA0571) (the “Loudoun County System”), Stafford (VA311) (the “Stafford County System”), and Spotsylvania (VA0283) and Fredericksburg (VA0818) (the “Spotsylvania County System”)

<sup>4</sup> Entravision seeks to add the following communities served by Comcast of the District, LLC’s cable system in the Washington, D.C. DMA to the Station’s market: Washington (DC0002), US Soldiers Home (DC0003), Marine Barracks (DC0006), and Walter Reed Med Ctr (DC0007) (the “District of Columbia System”) (together with the communities in the above-listed Comcast Systems, the “Comcast Communities”).

<sup>5</sup> The coordinates for the Station’s former transmitter site are 39° 53' 25" N 77° 58' 5" W.

<sup>6</sup> See Section 6403 of the Middle Class Tax Relief and Job Creation Act (Pub. L. No. 112-96, § 6403, 126 Stat. 156, 225-230 (2012), codified at 47 U.S.C. § 309(j)(8)(G)) (the “Incentive Auction”).

Washington, D.C. (Channel 9) (Facility ID: 65593).<sup>7</sup> As part of its channel sharing arrangement, the Station has relocated its transmission facilities to the WUSA transmitter site located in Washington, D.C. and changed its community of license to Silver Spring, Maryland.<sup>8</sup>

## **B. Prior Market Modification Proceeding**

In 2003, the Commission issued a decision removing certain of the Comcast Communities from the Station's market.<sup>9</sup> In support of its decision, the Commission cited the geographic distance between WJAL's transmitter site and the Comcast Communities and the absence of Grade B signal coverage as well as the Station's lack of historical carriage, local programming and viewership in the Comcast Communities.<sup>10</sup>

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<sup>7</sup> WUSA-TV, Inc. is the licensee of Station WUSA. WUSA's transmission facilities are located in Northwest Washington, D.C. (38° 57' 1" N 77° 4' 46" W).

<sup>8</sup> See FCC File No. 0000029066 (WJAL construction permit for shared television broadcast station).

<sup>9</sup> See *Comcast Cablevision of the District, LLC et al.*, Memorandum Opinion and Order, 18 FCC Rcd 16510 (MB 2003) ("Comcast Order"). Appendix A to the Comcast Order lists the communities removed from the Station's market. WJAL seeks to restore those communities to its market, as well as any Comcast Communities acquired or created since the Comcast Order, including Chesapeake Beach and North Beach (in Comcast's Calvert County System), North Chevy Chase Village, Chevy Chase View, Martins Additions Village and Chevy Chase Village Section 3 (in Comcast's Montgomery County System), Manassas (VA0362) and Occoquan (in Comcast's Prince William County and Fairfax County System), and Washington and US Soldiers Home (in Comcast's District of Columbia System). In addition, certain of the Comcast Communities were not dealt with in the Comcast Order and, in an abundance of caution, Entravision seeks to confirm that Comcast's cable systems in the Washington metropolitan area are now within WJAL's market.

<sup>10</sup> The Commission emphasized that the average distance between WJAL's transmitter site and the Comcast Communities was 80 miles and that the Station only provided peripheral Grade B coverage to two of the Comcast Communities. *Id.* at ¶ 7.

### C. The Instant Proceeding

In *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*,<sup>11</sup> the Commission indicated that the carriage rights of spectrum sharing stations would not automatically change as a result of new channel sharing arrangements,<sup>12</sup> but that a channel sharee “may seek to add communities to its market which it can now reach from its new location...”<sup>13</sup>

Entravision submits that, based on WJAL’s relocation to the heart of the Washington, D.C. DMA, the Comcast Communities now properly belong in the Station’s market and the market should be modified accordingly. While channel sharing stations may be new to the market modification process, the Commission has dealt with analogous circumstances in recent cases. Specifically, as discussed in more detail below, the Commission has added communities to the markets of digital stations that have dramatically improved their signal coverage through relocation to new transmitter sites or through the use of distributed transmission systems (“DTS”). In the instant matter, improved signal coverage to the Comcast Communities resulting from WJAL’s new channel sharing arrangement similarly supports restoration of the Comcast Communities to the Station’s market.

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<sup>11</sup> Report and Order, 29 FCC Rcd 6567 (2014) (“*Incentive Auction R&O*”).

<sup>12</sup> “A station’s carriage rights will not be expanded or diminished through [the channel sharing/relocation] process, although its ability to exercise these rights may change based upon the facts of its specific channel sharing arrangement.” *Id.* at ¶ 709.

<sup>13</sup> *Id.*

**II. THE MARKET MODIFICATION FACTORS ENUMERATED IN SECTION 614(H) OF THE COMMUNICATIONS ACT SUPPORT ADDITION OF THE COMCAST COMMUNITIES TO WJAL'S MARKET**

In accordance with Section 614(h)(1)(C)(ii) of the Communications Act, in evaluating market modification petitions, the Commission considers the following factors:

- (I) Whether the station, or other stations located in the same area, have been historically carried on the cable system or systems within such community;
- (II) Whether the television station provides coverage or other local service to such community;
- (III) Whether modifying the market of the television station would promote consumers' access to television broadcast station signals that originate in their state of residence;
- (IV) Whether any other television station that is eligible to be carried by a cable system in such community in fulfillment of the requirements of this section provides news coverage of issues of concern to such community or provides carriage or coverage of sporting and other events of interests to the community; and
- (V) evidence of viewing patterns in cable and noncable households within the areas served by the cable system or systems in such community.<sup>14</sup>

As set forth below, application of these market modification factors to WJAL's new channel-sharing arrangement from the hub of the Washington, D.C. DMA and

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<sup>14</sup> 47 U.S.C. § 534(h)(1)(C)(ii)(I)-(V). *See also Second Report and Order, Definition of Markets for Purposes of the Cable Television Broadcast Signal Carriage Rules*, Order on Reconsideration and Second Report and Order, 14 FCC Rcd 8366, 8369-8370 (1999); The STELA Reauthorization Act of 2014, Pub. L. No. 113-200, 128 Stat. 2059 (2014) (adding new statutory factor, denominated as factor (III) above); *Amendment to the Commission's Rules Concerning Mkt. Modification, Implementation of Section 102 of the STELA Reauthorization Act of 2014*, Report and Order, 30 FCC Rcd 10406 (2015).

Commission precedent support restoration of the Comcast Communities to the Station's market.

**A. Historical Carriage**

The first statutory factor, historical carriage, addresses "whether the station, or other stations located in the same area, have been historically carried on the cable system or systems within such community."<sup>15</sup> This factor can demonstrate the presence of a "'market nexus' between the broadcast station and the communities where the station is carried and thus provide evidence as to the scope of a station's market."<sup>16</sup> WJAL has no history of cable carriage in the Comcast Communities. However, the reported decisions of the Commission confirm that broadcast stations can satisfy the historical carriage factor through means other than direct carriage on the subject cable systems.

First, the Commission considers co-located stations in evaluating the historical carriage factor. For example, in *Tennessee Broadcasting Partners, supra*, the Commission considered carriage of a co-located station in a particular community as evidence of the petitioner station's nexus with that community, and noted that petitioner station's lack of carriage put it at a competitive disadvantage in the market.<sup>17</sup> In the instant case, Comcast carries WUSA, WJAL's channel sharing partner, throughout all of its cable systems in the Washington DMA. As noted above, WJAL now broadcasts using WUSA's transmitter in Washington, D.C., the same transmitter site from which

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<sup>15</sup> 47 U.S.C. § 534(h)(1)(C)(ii)(I).

<sup>16</sup> *Tennessee Broadcasting Partners*, 23 FCC Rcd 3928, ¶ 5 (MB 2008).

<sup>17</sup> *See id.* at ¶ 10. *See also WSBS Licensing, Inc.*, Memorandum Opinion and Order, 32 FCC Rcd 4159, ¶ 7 (MB 2017) (weighing historical carriage factor in favor of restoring communities to the market of Station WSBS-TV, Key West, Florida based in part on carriage of co-located Station WGEN-TV, Key West, Florida in subject communities).



Station WJLA-TV, Washington, D.C. broadcasts as well. In fact, as evidenced by the cable channel lineups attached hereto as **Exhibit A**, Comcast carry every full-power television station broadcasting from a transmitter site located within the District of Columbia and its immediate surrounding areas.<sup>18</sup> Any refusal to carry WJAL on the part of Comcast would have nothing to do with the Station's nexus to the market and would place WJAL at a severe disadvantage compared to other Washington, D.C.-area licensed stations.

Next, the Commission also considers station carriage by competitors in the relevant communities, or carriage in communities that overlap with or are adjacent to the subject communities as evidence of market ties between the station and the subject community.<sup>19</sup> As evidenced by the local channel lineup in **Exhibit B**, WJAL is presently carried throughout the Washington, D.C. DMA by DISH Network, including in the areas

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<sup>18</sup> In addition to WUSA, those stations are Station WDCA(TV), Washington, D.C. (Facility ID: 51567); Station WDCW(TV), Washington, D.C. (Facility ID: 30576); Station WETA-TV, Washington, D.C. (Facility ID: 65670); Station WFDC-DT, Arlington, Virginia (Facility ID: 69532); Station WHUT-TV, Washington, D.C. (Facility ID: 27772); Station WJLA-TV, Washington, D.C. (Facility ID: 1051); Station WPXW-TV, Manassas, Virginia (Facility ID: 74091); Station WRC-TV, Washington, D.C. (Facility ID: 47904); and Station WTTG(TV), Washington, D.C. (Facility ID: 22207).

<sup>19</sup> See *Petition for Modification of Philadelphia, PA Designated Market Area With Regard to Station WACP, Atlantic City, NJ*, Memorandum Opinion and Order, 29 FCC Rcd 1835, 1845, ¶ 19, n. 77 (MB 2014) (finding historic carriage by competing systems a strong indicator under first statutory factor); *WRNN v. Cablevision*, 22 FCC Rcd 21054, 21056, ¶ 4, n. 15 (MB 2007) (crediting carriage on competing system in support of historic carriage factor). See also *Paxson Atlanta License, Inc.*, 13 FCC Rcd 20087, 20100 (1998) (finding carriage on adjacent systems indicative of market nexus between communities and station); *Christian Faith Broadcast, Inc. v. Cox Communications*, 22 FCC Rcd 16919, 16923 (MB 2007) (noting that station's carriage on cable systems located near the subject communities may be indicative of economic ties between the station and the subject communities).

constituting the Comcast Communities.<sup>20</sup> WJAL is also carried on Comcast's Frederick County and Carroll County system in communities<sup>21</sup> near Comcast Communities served by Comcast's Montgomery County system. WJAL is also carried on Comcast's Frederick County and Clarke County system in communities<sup>22</sup> near Comcast Communities served by Comcast's Prince William County and Fairfax County system. WJAL's current cable carriage communities are listed in **Exhibit C**. WJAL's current cable carriage reflects the location of its former Mercersburg, Pennsylvania transmitter site on the periphery of the Washington, D.C. DMA. As noted, the Station's new transmitter site is located within the population center of the Washington D.C. DMA.

Additionally, the Commission has long recognized that new stations will not have a history of carriage and that this factor is thus of limited relevance in market modification cases involving such stations.<sup>23</sup> While WJAL is not new to broadcast television service, its relocation to a transmitter site in Washington, D.C., where it did not previously provide over-the-air service, and its community of license change to Silver

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<sup>20</sup> WJAL is not presently carried by DirecTV, the other DBS service in the Washington, D.C. market, due to a retransmission consent agreement pursuant to which DirecTV retransmits Entravision's Station WMDO-CD, Washington, D.C. in return for Entravision not seeking must-carry treatment for WJAL.

<sup>21</sup> These communities include Frederick, Walkersville, Middletown, Jefferson, Braddock Heights, Brunswick, Fort Detrick, Rosemont, Thurmont, New Market, Woodsboro, Myersville, Emmitsburg, Burkittsville, and Mount Airy.

<sup>22</sup> These communities include Winchester, Berryville, Boyce, Middletown, and Stephens City.

<sup>23</sup> "[W]ith new stations, failure to establish either historic carriage or significant viewership is given lesser weight, and we typically rely more on a station's Grade B contour to delineate its market." *Petition for Modification of Philadelphia, PA Designated Market Area With Regard to Station WACP, Atlantic City, NJ*, Memorandum Opinion and Order, 29 FCC Rcd 1835, 1845, ¶ 19 (MB 2014) (citing *Time Warner Entertainment-Advance /Newhouse Partnership*, 22 FCC Rcd 13642, 13649, ¶ 14 (MB 2007). See also *Time Warner Entertainment Co., L.P.*, 12 FCC Rcd 22069, 22077 (1997); *Horizon Broadcasting Corporation*, 12 FCC Rcd 11634, 11638 (1997); *Time Warner Cable*, 11 FCC Rcd 8047, 8053-54 (1996).

Spring, Maryland in the heart of the Washington, D.C. DMA, render it the equivalent of a new station for market modification purposes.<sup>24</sup> Likewise, since WJAL has long been excluded from the Comcast Communities, it should now be considered new to those communities. With respect to new stations, signal coverage is often the most important factor.<sup>25</sup>

**B. Local Coverage and Local Service**

Under the second statutory factor, the Commission considers the signal coverage and local service that a station provides to the communities at issue. According to the Commission:

To show that a station provides coverage or other local service to the cable communities, parties may demonstrate that the station places at least a Grade B coverage contour over the cable community, or is located close to the community in terms of mileage.<sup>26</sup>

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<sup>24</sup> See *Incentive Auction R&O*, *supra*, at ¶ 709.

<sup>25</sup> In rejecting a request to remove communities from the market of new Station WACP(TV), the Commission reasoned as follows:

In this matter, WACP has no history of carriage on Armstrong's cable system in the communities at issue, provides no programming oriented toward them, and obtains no audience viewership values therein. However, WACP is a new station and its viewership and historical carriage carry lesser weight in our analysis. In a case such as this, to define the current limit of WACP's market, we typically rely on a station's service area in conjunction with other factors, and given that WACP apparently provides no programming targeted to the communities at issue, we rely on the limit of its Grade B contour taken together with its carriage by competing providers in the communities at issue and its carriage on proximate systems. Because WACP is a new station, these factors weigh against granting [petitioner's] request to modify WACP's market to remove the communities at issue.

*WACP*, *supra*, 29 FCC Rcd at 1848, ¶ 27.

<sup>26</sup> *Tennessee Broadcasting Partners*, *supra*, 23 FCC Rcd at ¶ 11. The Grade B contour defined an analog television station's service area.

Traditionally, the Commission has given substantial weight to signal coverage as an accurate measure of the scope of a station's market. As correctly noted by CoxCom, Inc. in a different proceeding, "the Commission has long recognized that Grade B contour coverage, in the absence of other determinative market facts, is an efficient tool to adjust market boundaries because it is a sound indicator of the economic reach of a particular television station's signal."<sup>27</sup> According to Cox, "unless other factors confirm market separations, the Commission logically views the economic market of a broadcast station to be the area in which consumers receive the station using a home antenna."<sup>28</sup>

### **1. Contour and Signal Strength**

Under Commission standards developed in the analog context, Grade B coverage is generally accepted as "an efficient tool to adjust market boundaries."<sup>29</sup> For digital television stations, the Commission has established a station's noise-limited contour as the functional equivalent of a Grade B contour.<sup>30</sup>

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<sup>27</sup> *CoxCom, LLC*, Memorandum Opinion and Order, 30 FCC Rcd 10978, ¶ 11 (MB 2015). *See also Market Modifications and the New York Area of Dominant Influence Petitions for Reconsideration and Applications for Review*, 12 FCC Rcd 12262, 12267, ¶ 10, 12271, ¶ 17 (1997) ("[G]rade B coverage, in the absence of other determinative market facts . . . is an efficient tool to adjust market boundaries because it is a sound indicator of the economic reach of a particular television station's signal").

<sup>28</sup> *Id.*

<sup>29</sup> *Costa de Oro Television, Inc.*, 13 FCC Rcd 4360, ¶ 30 (CSB 1998). *See also Suburban Cable TV Co., Inc.*, 16 FCC Rcd 10790, 10797 (CSB 2001) (citing *Carriage of Digital Broadcast Television Signals*, 16 FCC Rcd 2598, 2977 (2001) ("as a general matter Grade B coverage demonstrates service to cable communities and serves as a measure of a station's natural economic market")).

<sup>30</sup> A digital television station's service area is defined as the area within its noise-limited contour where its signal strength is predicted to exceed the noise-limited contour service level – which for channels 7-13 is 36 dBu. *See* 47 C.F.R. § 73.622(e). The Commission treats a digital station's noise-limited contour as the functional equivalent of an analog station's Grade B contour. *See Report to Congress: The Satellite Home Viewer Extension and Reauthorization Act of 2004; Study of Digital Television Field Strength Standards and Testing Procedures*, 20 FCC Rcd 19504, 19507, ¶ 3, 19554, ¶ 111

The contour map attached hereto as **Exhibit D** provides a side-by-side comparison of WJAL's old and new contours. The map attached hereto as **Exhibit E** shows WJAL's new contour in relation to representative Comcast Communities and Comcast's cable headends. These maps clearly demonstrate that the Station's 36 dBu contour encompasses the Comcast Communities. Based on the dramatic signal coverage gains accompanying WJAL's new channel sharing arrangement, this crucial market modification factor now supports inclusion of the Comcast Communities in the Station's market.

In a number of recent cases, the Commission has restored once-deleted communities to a Station's market based upon similar gains in signal coverage. For example, in *KAZN-TV Licensee, LLC*,<sup>31</sup> the Commission returned a number of communities to the market of Los Angeles DMA-based Station KILM(TV), Barstow, California, communities that had been removed from KILM's market a decade earlier.<sup>32</sup> In reversing its previous decision, the Commission noted that the range of KILM's signal had expanded due to KILM's use of a new DTS transmission facility.<sup>33</sup> Indeed, the Commission restored the communities to KILM's market based almost entirely on the station's improved signal coverage, as the Commission found no local programming, no viewership, and some historical carriage, while largely ignoring Barstow's position on

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(2005); *Implementation of the Satellite Home Viewer Extension and Reauthorization Act of 2004, Implementation of Section 340 of the Communications Act*, Report and Order, 20 FCC Rcd 17278, 17292, ¶ 31 (2005).

<sup>31</sup> 30 FCC Rcd 8126 (MB 2015).

<sup>32</sup> See *Time Warner Cable Petition for Modification of the Television Market of Television Station KHIZ(TV), Barstow, California*, 18 FCC Rcd 20536 (2003) (deleting communities from KHIZ's market based on no signal coverage, no historical carriage, no viewership, no nexus to communities in question). KHIZ is the former call sign for KILM.

<sup>33</sup> *KAZN-TV Licensee, supra*, 30 FCC Rcd at ¶¶ 20, 25.

the periphery of the Los Angeles DMA.<sup>34</sup> The Commission credited KILM's investment in its DTS facility and its promise to improve its local programming as evidencing "a sincere desire to serve the communities," and granted KILM's market modification request on those grounds.<sup>35</sup>

In *KJLA, LLC*,<sup>36</sup> the Commission similarly restored cable communities to a digital television station's market based in part on dramatic improvements in the station's signal coverage. Like KILM, KJLA had previously had a number of communities deleted from its market based upon insufficient signal coverage.<sup>37</sup> In the course of the transition to digital television service, KJLA moved its transmitter site from Ventura, California to the Mount Wilson antenna farm, the location for most Los Angeles television stations, and significantly enhanced its signal coverage to the communities in question.<sup>38</sup> The Commission granted KJLA's request to restore the subject communities to its market because, in the years since the previous order, "KJLA's circumstances [had] radically changed: [it] relocated its transmitter site from South Mountain, Ventura County to Mount Wilson, Los Angeles...opened studios in Los Angeles and commenced digital-only operations." The Commission found that KJLA's deficits in historical carriage and viewership were offset by its "robust signal coverage" and the fact that cable operators carried "every other station co-located with KJLA at the Mount Wilson antenna farm."<sup>39</sup>

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<sup>34</sup> *Id.* at ¶ 25.

<sup>35</sup> *Id.*

<sup>36</sup> Memorandum Opinion and Order, 26 FCC Rcd 12652 (MB 2011).

<sup>37</sup> *See Costa de Oro Television, supra*, 13 FCC Rcd 4360; *Costa de Oro Television, Inc. (II)*, 15 FCC Rcd 12637, 12644 ¶ 15 (2000).

<sup>38</sup> *KJLA, LLC*, 26 FCC Rcd at 12655, ¶ 8.

<sup>39</sup> *Id.* at ¶ 16. *See also WRNN License Company, LLC*, 20 FCC Rcd 7904 (MB 2005). In *WRNN License Company*, the Commission modified the market of Station WRNN-DT, Kingston, New York to add cable communities that had been deleted from

As these cases establish, the “radical changes” in WJAL’s circumstances – its channel sharing arrangement, its new community of license, its new transmitter site, and its newly “robust signal coverage” of the Comcast Communities – warrant the return of these communities to the Station’s market.

## 2. Geographic Proximity

In connection with the second factor, the Commission also examines a station's proximity to the subject communities in terms of mileage. In the past, the Commission has reviewed: (i) mileage distances between a station's transmitter site and the communities at issue,<sup>40</sup> and/or (ii) mileage distances between a station's community of license and the subject communities.<sup>41</sup> Under Commission decisions applying both/either of these approaches, the Station is geographically proximate to the Comcast Communities for purposes of Section 614(h)'s local service factor.

The map attached hereto in Exhibit E includes the Station's Washington, D.C. transmitter site, representative Comcast Communities, and a graphic depiction of the distance between WJAL’s transmitter site and the selected communities. These distances were calculated using Google Maps and are reported on a mileage basis. **Exhibit F**

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the station’s market by a previous market modification order. *See id.* at ¶ 10 (citing *Petition of Time Warner New York City Cable Group for Modification of ADI for Station WRNN, Kingston, NY*, 11 FCC Rcd 6528 (1996), *aff’d* *WLNY-TV, Inc. v. FCC*, 163 F.3d 137 (2d Cir. 1998). Upon transitioning to digital service, WRNN relocated its transmitter site from Overlook Mountain, Woodstock, New York to Beacon Mountain, New York, thereby halving the distance between its transmitter site and the subject communities. WJAL’s experience moving from Mercersburg, Pennsylvania to Washington, D.C. in connection with its post-Incentive Auction channel sharing operation is analogous to WRNN's transmitter move in the course of the digital television transition.

<sup>40</sup> *See, e.g., WRNN License Company, supra*, 20 FCC Rcd at 7909, ¶ 10 (noting distances between station's transmitter site and cable communities at issue).

<sup>41</sup> *See, e.g., Time Warner Entertainment-Advance /Newhouse Partnership, supra*, 22 FCC Rcd at 13646, ¶ 9 (noting distance between station's community of license and communities at issue).

includes separate tables that detail the distance between the Station's transmitter site and the individual Comcast Community. These distances were likewise calculated using Google Maps and are reported on a mileage basis.

The average and median distances between the Station's transmitter site and the Comcast Communities served by Comcast's Charles County and St. Mary's County system, Prince George's County System, and Calvert County System are 17.3 miles and 12 miles, respectively.<sup>42</sup> The average and median distances between the Station's transmitter site and the Comcast Communities served by Comcast's Montgomery County System and Arlington County System are 8.6 miles and 5 miles, respectively.<sup>43</sup> The average and median distances between the Station's transmitter site and the Comcast Communities served by Comcast's Prince William County and Fairfax County system, Reston-Fairfax County system, Alexandria – Arlington County system, Fort Myer – Arlington County system, Loudoun County system, Stafford County system and Spotsylvania County system are 29.4 miles and 31 miles, respectively.<sup>44</sup> The average and median distances between the Station's transmitter site and the Comcast Communities served by Comcast's District of Columbia system are virtually non-existent, as the transmitter site is located in the District of Columbia.<sup>45</sup>

These distances are well within range of the distances the Commission has approved for adding communities to a station's market.<sup>46</sup> Further, as the Commission has

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<sup>42</sup> See Exhibit F.

<sup>43</sup> See Exhibit F.

<sup>44</sup> See Exhibit F.

<sup>45</sup> See Exhibit F.

<sup>46</sup> *WACP, Atlantic City, NJ, supra*, 29 FCC Rcd at 1846, ¶ 20 (modifying WACP's market to include cable communities with system headend located 62 miles from WACP's transmitter site); *KJLA, LLC, supra*, 26 FCC Rcd at 12657, ¶ 11 (modifying



previously noted, a cable operator's existing carriage of stations with the same or similar transmitter site-to-cable community distances effectively refutes any claim that the distances in question are too great to permit a true market nexus..<sup>47</sup>

**Exhibit G** includes separate tables that detail the driving distance, using Google Maps, between the Station's community of license, Silver Spring, Maryland, and the individual Comcast Community. The average and median driving distances between Silver Spring and the Comcast Communities served by Comcast's Charles County and St. Mary's County system, Prince George's County system, and Calvert County system are 22 miles and 16 miles, respectively.<sup>48</sup> The average and median driving distances between Silver Spring and the Comcast Communities served by Comcast's Montgomery County system and Arlington County system are virtually non-existent as to the Montgomery County system, as Silver Spring, Maryland is located in Montgomery County, Maryland, and 7.5 miles in the case of the Arlington County system.<sup>49</sup> The average and median driving distances between Silver Spring and the Comcast Communities served by Comcast's Prince William County and Fairfax County system, Reston – Fairfax County system, Alexandria – Arlington County system, Fort Myer – Arlington County system, Loudoun County system, Stafford County system, and Spotsylvania County system are

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KJLA's market to include communities located from 35-76 miles from KJLA's transmitter site); *WRNN License Company, supra*, 20 FCC Rcd at 7909, ¶ 10 (modifying WRNN's market to include communities located from 42-56 miles from WRNN's transmitter site)]

<sup>47</sup> See *Time Warner Entertainment-Advance /Newhouse, supra*, 22 FCC Rcd at 13646, ¶ 15. See also *WSBS Licensing, supra*, 32 FCC Rcd at ¶ 8, n.30 (citing *Brenmor Cable Partners, L.P. et al.*, Memorandum Opinion and Order, 14 FCC Rcd 11742, 11754, ¶ 32 (CSB 1999) ("the significance of geographic distance can be mitigated by other factors such as the carriage of similarly-situated television stations")).

<sup>48</sup> See Exhibit G.

<sup>49</sup> See Exhibit G.

41.2 miles and 42 miles, respectively.<sup>50</sup> The average and median driving distances between Silver Spring and the Comcast Communities served by Comcast's District of Columbia system are also virtually non-existent as Silver Spring immediately abuts the District of Columbia.<sup>51</sup>

Again, these distances are well within range of the distances the Commission has approved for adding communities to a station's market.<sup>52</sup> And once again, the Commission has previously rejected cable operators' geographic distance-related objections where those cable operators carry other stations with the same or similar community of license-to-cable community distances.<sup>53</sup>

In short, WJAL's geographic proximity to the Comcast Communities is in keeping with Commission precedent whether measured from the Station's transmitter site or its community of license. Accordingly, geography and distance considerations no less than the Station's robust signal coverage of the Comcast Communities weigh in favor of WJAL's market modification request.

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<sup>50</sup> See Exhibit G.

<sup>51</sup> See Exhibit G.

<sup>52</sup> See *WACP, Atlantic City, NJ, supra*, 29 FCC Rcd at 1846, ¶ 20 (modifying WACP's market to include cable communities with system headend located 88 miles from WACP's community of license); *KJLA, LLC, supra*, 26 FCC Rcd at 12657, ¶ 11 (modifying KJLA's market to include communities located from 64-108 miles from KJLA's community of license); *WRNN License Company, LLC, supra*, 21 FCC Rcd 5952, at ¶ 13 (MB 2006) (approving addition of cable communities to WRNN's market, despite cable operator's objections that the driving distance between station community of license and the nearest cable community 111 miles), *aff'd in WRNN License Company, LLC*, 22 FCC Rcd 21054 (2007).

<sup>53</sup> See *Time Warner Entertainment-Advance /Newhouse, supra*; *WSBS Licensing, supra*.

### 3. Local Programming

The Commission also looks to station programming with a "distinct nexus" to the communities at issue as evidence of local service.<sup>54</sup>

As evidenced by the programming schedule attached hereto as **Exhibit H**, WJAL presently broadcasts family-friendly general programming without specialized content targeting the Comcast Communities.<sup>55</sup> Entravision is hopeful that WJAL's relocation to Silver Spring and its new channel sharing operation will foster opportunities to provide local programming to these communities.<sup>56</sup> In the meantime, Entravision submits that, under Commission precedent, the Station's robust signal coverage and geographic proximity to the Comcast Communities outweigh any current deficits in the Station's local programming.<sup>57</sup>

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<sup>54</sup> *Tennessee Broadcasting Partners, supra*, 23 FCC Rcd at ¶ 22 (citing *Jones Cable TV Fund 12-A, Ltd.*, 14 FCC Rcd 2808, 2818, ¶ 24 (1999)).

<sup>55</sup> Entravision notes that WJAL's general programming is similar in nature to the programming of other stations carried in the Comcast Communities, such as Station WDCW(TV), Washington, D.C. and Station WPXW-TV, Manassas, Virginia.

<sup>56</sup> *See KAZN-TV, supra*, 30 FCC Rcd at ¶ 25 (accepting Station's promise to improve its local programming as evidence of "a sincere desire to serve the [subject] communities" and adding the communities to the Station's market on the basis of that promise as well as the Station's improved signal coverage to the communities).

<sup>57</sup> In *WRNN License Company, LLC, supra*, 21 FCC Rcd at ¶¶ 14-16, the Commission accepted WRNN's local service showing based on news programming with limited focus on the subject communities principally because WRNN's local programming was accompanied by robust signal coverage. According to the Bureau:

The record in this proceeding is not impressive relative to WRNN's programming targeted to the Nassau Communities. Nevertheless, the record does indicate that WRNN airs at least some programming aimed at the Nassau Communities. More impressive, however, is the evidence that WRNN-DT places a Grade B signal contour over all of Nassau County. Indeed, WRNN-DT places a City Grade signal contour over a substantial portion of Nassau County.

#### 4. Shopping and Labor Patterns

The Commission also seeks information on shopping and labor patterns in order to help assess the market connection between a station and the communities at issue. As demonstrated herein, the Station's community of license, Silver Spring, and the Station itself share strong economic connections with communities throughout the Washington, D.C. market, including the Comcast Communities.

Attached hereto as **Exhibit I** are pages from the websites of the Montgomery County Economic Development Corporation and Silver Spring Downtown. **Exhibit J** contains a Metro Map from the Washington Metropolitan Area Transit Authority. **Exhibit K** contains a U.S. Census Commuting Characteristics datasheet. As these documents demonstrate, Silver Spring borders Washington, D.C. and is connected to the both the city and the larger metro area by interstate highways, including the Capital Beltway, and the Washington regional Metro System. The Silver Spring Metro stop is the first stop north of the District of Columbia, on that portion of WMATA's Red Line, in Montgomery County. Silver Spring contains thriving business, entertainment and shopping districts that attract residents from all over the Washington metropolitan area, including residents of the Comcast Communities. Silver Spring's home county, Montgomery County, is also home to the Comcast Communities served by Comcast's Montgomery County system (of which Silver Spring is one), and Silver Spring shares state and federal representatives in common with these communities. As the U.S. Census datasheet attached in Exhibit K indicates, 42.7 percent of Silver Spring residents work outside the state of Maryland, further demonstrating the interconnectedness between

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*Id.* at ¶ 16. In the instant proceeding, WJAL provides general interest programming and robust 36 dBu signal coverage to viewers in the Comcast Communities.

Silver Spring, Washington, D.C., and the surrounding metro area in which the Comcast Communities are located.

In connection with its channel sharing relocation, the Station has also moved its studio to Washington, D.C. Thus, both the Station and its community of license are united by common economic, social and cultural ties to the broader Washington, D.C. metropolitan market

In sum, the Station's superior signal coverage, geographic proximity, and shopping and labor patterns vis-à-vis the Comcast Communities support weighing the local coverage and service factor in WJAL's favor.

**C. Consumers' Access to In-State Broadcast Signals**

WJAL is licensed to Silver Spring, Maryland, and thus satisfies this factor with respect to the Comcast Communities located in the state of Maryland.<sup>58</sup> Alternatively, because the Virginia-Maryland-D.C. metropolitan area that comprises the Washington, D.C. DMA is well-served by several in-state broadcast signals, under Commission precedent this factor is inapplicable in the instant case.<sup>59</sup>

**D. Local Service of Other Stations Currently Carried by Comcast**

Under the fourth statutory factor, the Commission must consider "[w]hether any other television station that is eligible to be carried by a cable system in such community in fulfillment of the requirements of this section provides news coverage of issues of

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<sup>58</sup> See *Woods Communications Corporation*, Memorandum Opinion and Order, DA 177-779, ¶ 9 (MB rel. Aug. 16, 2017) ("petitioner is considered to satisfy [the third] factor if the involved station is licensed to a community within the same state as the new community").

<sup>59</sup> See *WSBS Licensing*, *supra*, 32 FCC Rcd at ¶ 10 (assigning no weight to the third factor because the DMA in question well-served by in-state signals).

concern to such community or provides carriage or coverage of sporting and other events of interests to the community."<sup>60</sup>

The Commission has long held that Congress intended this factor to serve only as an "enhancement factor," to be offered in support of a local broadcast television station's market claims, but not as evidence against them.<sup>61</sup> As the Commission stated in *WSBS Licensing, supra*, "we believe Congress intended for this [fourth] statutory criterion to enhance a station's market modification claim where it could be shown that other stations did not serve the communities at issue. [Where] other stations do serve the communities, this factor neither weighs against nor in favor of [the Petitioner's] modification request."<sup>62</sup>

Thus, in the instant matter, this statutory factor should simply drop out of the market modification analysis.

#### **E. Viewing Patterns**

Pursuant to the fifth statutory factor, the Commission considers "evidence of viewing patterns in cable and noncable households within the areas served by the cable system or systems in such community."<sup>63</sup> Entravision submits that the WJAL's low to nonexistent viewership numbers across the Washington, D.C. market reflect its historical position on the periphery of the market.

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<sup>60</sup> 47 U.S.C. § 534(h)(1)(C)(ii)(III). See also *Tennessee Broadcasting Partners, supra*, 23 FCC Rcd at ¶ 49.

<sup>61</sup> *Tennessee Broadcasting Partners, supra*, 23 FCC Rcd at ¶ 49. See also *WSBS Licensing, supra*, 32 FCC Rcd at ¶ 11 (citing

<sup>62</sup> 32 FCC Rcd at ¶ 11 (quoting *Petition for Modification of Dayton, OH Designated Market Area*, Memorandum Opinion and Order, 28 FCC Rcd 16011, 16019, ¶ 22 (MB 2013)).

<sup>63</sup> 47 U.S.C. § 534(h)(1)(C)(ii)(IV). See also *Tennessee Broadcasting Partners, supra*, 23 FCC Rcd at ¶ 50.

For purposes of this factor, as with historical carriage, the Commission has routinely stated that lack of viewership is not a meaningful market modification factor in the context of new stations.<sup>64</sup> The radical changes in WJAL's circumstances make it something of a new station for market modification purposes, for whom the viewership (and historical carriage) factor is of less probative value than for ordinary stations.<sup>65</sup> The Station's community of license and transmitter site relocation and its dramatic improvement in signal coverage are recent occurrences and the Commission should consider this fact a mitigating circumstance with respect to any lack of viewership in the Comcast Communities.<sup>66</sup>

### **III. CONCLUSION**

As set forth above, analysis of the market modification factors indicate that the Comcast Communities properly belong in the Station's market.

Under Commission precedent, the third factor, consumers' access to in-state broadcast signals, and the fourth factor, the local service provided by other stations currently carried by Comcast, should simply drop out of the market modification

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<sup>64</sup> See *WACP, Atlantic City, NJ, supra*, 29 FCC Rcd at 1845, ¶ 19 ("with new stations, failure to establish either historic carriage or significant viewership is given lesser weight, and we typically rely more on a station's Grade B contour to delineate its market"); *Time Warner Entertainment-Advance /Newhouse Partnership*, 22 FCC Rcd 13642, 13649, ¶ 14 (MB 2007). See also *Time Warner Entertainment Co., L.P.*, 12 FCC Rcd 22069, 22077 (1997); *Horizon Broadcasting Corporation*, 12 FCC Rcd 11634, 11638 (1997); *Time Warner Cable*, 11 FCC Rcd 8047, 8053-54 (1996).

<sup>65</sup> With respect to the overlap of the historical carriage and viewership factors, the Commission has expressly stated that "viewership is difficult to separate from historic cable carriage," and the factors mitigating any lack of historic carriage apply equally in the viewership context. *The Chronicle Publishing Company*, 10 FCC Rcd 9474, 9482 (CSB 1995).

<sup>66</sup> See, e.g., *CoxCom, Inc. d/b/a Cox Communications Orange County, et al.*, 24 FCC Rcd 1487 at ¶ 12 (MB 2009) ("because KVMD's signal has only recently improved, we believe that KVMD has not had sufficient time to demonstrate its audience appeal to cable and noncable households in the modified communities").

analysis. With respect to historical carriage, the first factor, Comcast's carriage of stations co-located with the Station and the Station's carriage on satellite and cable systems overlapping with and adjacent to the Comcast Communities support weighing this factor in WJAL's favor. In any event, with regard to historical carriage and viewership, the fifth factor, the Commission has previously held that an insufficient showing under these criteria is offset by a station's status as a new station, or by recent changes in signal strength and coverage capabilities. To the extent the Commission finds the Station's historical carriage and viewership credentials lacking, the Commission should apply the same offsets here.

With respect to the crucial second factor, local coverage and service, it is beyond dispute that WJAL covers the Comcast Communities with the Station's 36 dBu noise-limited contour. With respect to distance considerations, the Station's geographic proximity to the Comcast Communities is in keeping with Commission precedent, whether measured from the Station's transmitter site or its community of license. WJAL's community of license, Silver Spring, Maryland, and the Station itself are united to the broader metro D.C. area, including the Comcast Communities, by common economic, social, and cultural ties. These ties, together with geographic proximity and the Station's robust signal coverage should outweigh any deficits the Commission finds in the Station's current local programming. Entravision hopes to improve the Station's local programming in the future, and this commitment together with the Station's strong geographic proximity and signal coverage showing support weighing the local service factor in WJAL's favor.



Much has changed since WJAL's previous market modification decisions were decided. As noted above, the Station has entered into a channel sharing arrangement with a District of Columbia-based station, relocated its transmitter site from Mercersburg, Pennsylvania to Washington, D.C., changed its community of license from Hagerstown to Silver Spring, Maryland, opened a studio in DC, and achieved extraordinary signal coverage gains in the Comcast Communities. All of these changes evidence a clear market nexus with the Comcast Communities, and demonstrate that the subject communities rightfully belong in the Station's market.

WHEREFORE, it is respectfully requested that the Commission grant the instant Petition for Special Relief filed by Entravision Holdings, LLC, the licensee of Station WJAL(TV), Silver Spring, Maryland, in which Entravision seeks to modify the Station's market to include the cable communities served by Comcast in the Washington, D.C.

DMA

Respectfully submitted,

**ENTRAVISION HOLDINGS, LLC**

By: \_\_\_\_\_

A handwritten signature in blue ink, consisting of a stylized 'B' followed by a horizontal line.

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Its Attorneys

Dated: November 7, 2017

**Verification**

The undersigned certifies that he has read the submission and to the best of his knowledge, information, and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law; and that it is not interposed for any improper purpose.

Respectfully submitted,

**ENTRAVISION HOLDINGS, LLC**

By:  \_\_\_\_\_

Dated: November 6, 2017

## **EXHIBIT A**

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## Washington, DC – Effective July 1, 2015

LIMITED BASIC			LIMITED BASIC			LIMITED BASIC			LIMITED BASIC		
SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME
4	941	C-SPAN	278		MHz China News Channel	266		WETA Kids	33	813	WPXW-66 (ION) Washington DC
104	942	C-SPAN2	280		MHz CNC World	265		WETA UK	198/568		WQAW-20 (Azteca America)
287		Daystar	277		MHz France 24	26	800	WETA-26 (PBS) Washington DC	208		WRC Cozi TV
98		Educational Access	272		MHz NHK World TV	14/561	794	WFDC-14 (Univision) Washington DC	24	804	WRC-4 (NBC) Washington DC
99		Educational Access	274		MHz RT	32	802	WHUT-32 (PBS) Washington DC	197		WTTG Buzzr
89/283		EVINE Live	271		MHz Worldview	205		WJLA Live Well Network	25	805	WTTG-5 (FOX) Washington DC
291	799	EWTN	268		MPT2	204		WJLA MeTV	207		WUSA Bounce TV
13		Gov't Access	28	808	NewsChannel 8	27	807	WJLA-7 (ABC) Washington DC	203		WUSA Justice
16		Gov't Access	95/96		Public Access	21	806	WMDE Soul of the South	29	809	WUSA-9 (CBS) Washington DC
3	811	HSN	30	798	QVC	270/558		WMDO LA TV	12/565	796	WZDC-25 (Telemundo) Washington DC
88		HSN2	290		TBN	15/563	795	WMDO-47 (uniMás) Washington DC	186/550		Xfinity Latino Barker
295		Inspiration Network	200		WDCA Movies!	269/559		WMPT V-me			
19/184		Jewelry TV	264/557		WDCA Mundo Fox	22	812	WMPT-22 (PBS) Annapolis			
190/191		Leased Access	20	810	WDCA-20 (MY) Washington DC	275		WNVC Bon-China			
279		MHz Arirang	201		WDCW Antenna TV	294		The Word Network			
276		MHz CCTV Documentary	206		WDCW This TV						
273		MHz CCTV News	23	803	WDCW-50 (CW) Washington DC						



# Montgomery County, MD – Effective August 1, 2016

LIMITED BASIC			EXPANDED BASIC			EXPANDED BASIC			FAMILY TIER		
SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME
7/565	796	WZDC-25 (Telemundo) Washington DC	179	924	GSN	96/180	900	WGN America	109	871	National Geographic Channel
186/550		Xfinity Latino Barker	137	830	Hallmark	<i>Includes Limited Basic, a standard definition digital converter &amp; remote on primary outlet, and access to pay-per-view &amp; On Demand programming. Digital Starter includes Limited Basic &amp; Expanded Basic.</i>			59	879	Nickelodeon
			157	894	Hallmark Movie & Mysteries				128	935	PBS Kids Sprout
			63	816	Headline News				110	872	Science Channel
			66	838	HGTV				133		Teen Nick
EXPANDED BASIC			51	875	History Channel	DIGITAL ECONOMY			98	815	The Weather Channel
SD	HD	CHANNEL NAME	111	899	Investigation Discovery	SD	HD	CHANNEL NAME	<i>Includes Limited Basic, a standard definition digital converter &amp; remote on primary outlet, and access to pay-per-view &amp; On Demand programming.</i>		
50	831	A&E	65	835	Lifetime	50	831	A&E			
67/138	889	AMC	119	895	Lifetime Movie Network	67/138	889	AMC			
54	868	Animal Planet	41	845	MASN	54	868	Animal Planet			
114	930	BBC America	31	844	MASN2	120		Aspire	DIGITAL PREFERRED		
71	866	BET	149		MoviePlex	71	866	BET	SD	HD	CHANNEL NAME
715	855	Big Ten Network	61	818	MSNBC	58	878	Cartoon Network	112		American Heros Channel
713		Big Ten Sports Overflow	72	884	MTV	62	817	CNN	120		Aspire
714		Big Ten Sports Overflow		882	MTV Live	69	828	Comedy Central	124		Baby First TV
103	814	Bloomberg TV	109	871	National Geographic Channel	53	869	Discovery Channel	171		BBC World News
68	832	Bravo	44	848	NBC Sports	56	880	Disney Channel	142		BET Jams
105		C-SPAN3	733	860	NFL Network	49	833	E!	144		BET Soul
58	878	Cartoon Network	59	879	Nickelodeon	76	839	Food Network	732	854	CBS Sports
60	819	CNBC	52	896	OWN	40	820	Fox News	174		Centric
62	817	CNN	123	931	Oxygen	137	830	Hallmark	145		CMT Music
8	856	The Comcast Network MA	128	935	PBS Kids Sprout	51	875	History Channel	122		Cooking Channel
45	846	Comcast SportsNet Mid-Atlantic	75	829	Syfy	65	835	Lifetime	113	873	Destination America
69	828	Comedy Central	599		TBN Enlace	64/187	841	truTV	130	934	Discovery Family Channel
53	869	Discovery Channel	35	826	TBS	74		TV Land	181		Discovery Life Channel
56	880	Disney Channel	38/169	890	TCM	47	823	USA	125		Disney Jr.
49	833	E!	55	837	TLC	116	948	Viceland	135	877	DisneyXD
42	850	ESPN	48	825	TNT	98	815	The Weather Channel	121		DIY
43	851	ESPN2	39	840	Travel Channel	<i>Includes Limited Basic, a standard definition digital converter &amp; remote on primary outlet, and access to pay-per-view &amp; On Demand programming.</i>			162		El Rey
79/118	834	Esquire	64/187	841	truTV				150	891	Encore
76	839	Food Network	74		TV Land				152		Encore Action
106	821	Fox Business Network	37/173	865	TV One				158		Encore Black
40	820	Fox News		822	Universal	FAMILY TIER			156		Encore Classics
729	857	Fox Sports 1	189	887	UP	SD	HD	CHANNEL NAME	134		Encore Family
57	881	Free Form	47	823	USA	130	934	Discovery Family Channel	154		Encore Suspense
36	824	FX		870	Velocity	56	880	Disney Channel	160		Encore Westerns
725	842	FXX	73	886	VH1	135	877	DisneyXD	<i>Includes Limited Basic, Expanded Basic, a standard definition digital converter &amp; remote on the primary outlet, access to pay-per-view &amp; On Demand programming. Channels not available on additional outlets with a Digital Adapter.</i>		
115	874	fyi,	116	948	Viceland	121		DIY			
567		Galavision	117	836	WE tv	76	839	Food Network			
46	849	Golf Channel	98	815	The Weather Channel	63	816	Headline News			
						66	838	HGTV			

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## Prince George's County, MD – Effective May 1, 2016

LIMITED BASIC			LIMITED BASIC			LIMITED BASIC			LIMITED BASIC		
SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME
24	941	C-SPAN	23		Jewelry TV	264/557		WDCA Heroes & Icons	270/558		WMDO LA TV
104	942	C-SPAN2	184		Jewelry TV	200		WDCA Movies!	15/563	795	WMDO-47 (uniMás) Washington DC
287		Daystar	190		Leased Access	20	810	WDCA-20 (MY) Washington DC	269/559		WMPT V-me
72		Educational Access	76		Local Origination	201		WDCW Antenna TV	22	812	WMPT-22 (PBS) Annapolis
73		Educational Access		996	Local Origination	206		WDCW This TV	275		WNVC Afria TV
74		Educational Access	279		MHz Arirang	3	803	WDCW-50 (CW) Washington DC	294		The Word Network
75		Educational Access	276		MHz CCTV Documentary	266		WETA Kids	16	813	WPXW-66 (ION) Washington DC
77		Educational Access	273		MHz CCTV News	265		WETA UK	198/568		WQAW-20 (Azteca America)
78		Educational Access	278		MHz CNC World	26	800	WETA-26 (PBS) Washington DC	208		WRC Cozi TV
96		Educational Access	277		MHz France 24	14/561	794	WFDC-14 (Univision) Washington DC	4	804	WRC-4 (NBC) Washington DC
89/283		EVINE Live	272		MHz NHK World TV	19	802	WHUT-32 (PBS) Washington DC	197		WTTG Buzzr
291	799	EWTN	274		MHz RT	205		WJLA CometTV	5	805	WTTG-5 (FOX) Washington DC
69		Gov't Access	280		MHz teleSUR	204		WJLA MeTV	207		WUSA Bounce TV
70		Gov't Access	271		MHz Worldview	7	807	WJLA-7 (ABC) Washington DC	203		WUSA Justice
71		Gov't Access	268		MPT2	21	806	WMDE Soul of the South			
2	811	HSN	8	808	NewsChannel 8						
88		HSN2	6	798	QVC						
295		Inspiration Network	290		TBN						



# Prince George's County, MD - Effective May 1, 2016

LIMITED BASIC			EXPANDED BASIC			EXPANDED BASIC			FAMILY TIER		
SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME	SD	HD	CHANNEL NAME
9	809	WUSA-9 (CBS) Washington DC	567		Galavision	116	876	Viceland	54	839	Food Network
18/565	796	WZDC-25 (Telemundo) Washington DC	65	849	Golf Channel	117	836	WE tv	28	816	Headline News
186/550		Xfinity Latino Barker	179	924	GSN	27	815	The Weather Channel	52	838	HGTV
			137	830	Hallmark	79/180	900	WGN America	109	871	National Geographic Channel
			157	894	Hallmark Movie & Mysteries	Includes Limited Basic, a standard definition digital converter & remote on primary outlet, and access to pay-per-view & On Demand programming. Digital Starter includes Limited Basic & Expanded Basic.			43	879	Nickelodeon
			28	816	Headline News				128	935	PBS Kids Sprout
			52	838	HGTV				110	872	Science Channel
			37	875	History Channel				133		Teen Nick
EXPANDED BASIC						DIGITAL ECONOMY			27	815	The Weather Channel
SD	HD	CHANNEL NAME				SD	HD	CHANNEL NAME	Includes Limited Basic, a standard definition digital converter & remote on primary outlet, and access to pay-per-view & On Demand programming.		
38	831	A&E	111	899	Investigation Discovery	38	831	A&E			
40	889	AMC	288		JUCE	40	889	AMC			
46	868	Animal Planet	50	835	Lifetime	46	868	Animal Planet			
114	930	BBC America	119	895	Lifetime Movie Network	120		Aspire	DIGITAL PREFERRED		
60	866	BET	62	845	MASN	60	866	BET	SD	HD	CHANNEL NAME
715	855	Big Ten Network	25	844	MASN2	45	878	Cartoon Network	193		Africa Channel
713		Big Ten Sports Overflow	149		MoviePlex	29	817	CNN	112		American Heros Channel
714		Big Ten Sports Overflow	30	818	MSNBC	61	828	Comedy Central	120		Aspire
103	814	Bloomberg TV	57	884	MTV	48	869	Discovery Channel	124		Baby First TV
39	832	Bravo		882	MTV Live	44	880	Disney Channel	171		BBC World News
105		C-SPAN3	109	871	National Geographic Channel	53	833	E!	142		BET Jams
45	878	Cartoon Network	64	848	NBC Sports	54	839	Food Network	144		BET Soul
297		The Church Channel	43	879	Nickelodeon	32	820	Fox News	732	854	CBS Sports
31	819	CNBC	49	896	OWN	137	830	Hallmark	174		Centric
29	817	CNN	123	931	Oxygen	37	875	History Channel	145		CMT Music
80	856	The Comcast Network MA	128	935	PBS Kids Sprout	50	835	Lifetime	122		Cooking Channel
10	846	Comcast SportsNet Mid-Atlantic	282		Smile of a Child	66/187	841	truTV	113	873	Destination America
61	828	Comedy Central	41	829	Syfy	42		TV Land	130	934	Discovery Family Channel
48	869	Discovery Channel	599		TBN Enlace	13	823	USA	181		Discovery Life Channel
44	880	Disney Channel	35	826	TBS	116	876	Viceland	125		Disney Jr.
53	833	E!	169	890	TCM	27	815	The Weather Channel	135	877	DisneyXD
11	850	ESPN	47	837	TLC	Includes Limited Basic, a standard definition digital converter & remote on primary outlet, and access to pay-per-view & On Demand programming.			121		DIY
12	851	ESPN2	36	825	TNT				162		El Rey
118	834	Esquire	55	840	Travel Channel				150	891	Encore
54	839	Food Network	66/187	841	truTV				152		Encore Action
106	821	Fox Business Network	42		TV Land	FAMILY TIER			158		Encore Black
32	820	Fox News	59	865	TV One	SD	HD	CHANNEL NAME	Includes Limited Basic, Expanded Basic, a standard definition converter & remote on the primary outlet, access to pay-per-view & On Demand programming. Channels not available on additional outlets with a Digital Adapter.		
63	857	Fox Sports 1		822	Universal	130	934	Discovery Family Channel			
17	881	Free Form	189	887	UP	44	880	Disney Channel			
33	824	FX	13	823	USA	135	877	DisneyXD			
725	842	FXX		870	Velocity	121		DIY			
115	874	fyi.	56	886	VH1						

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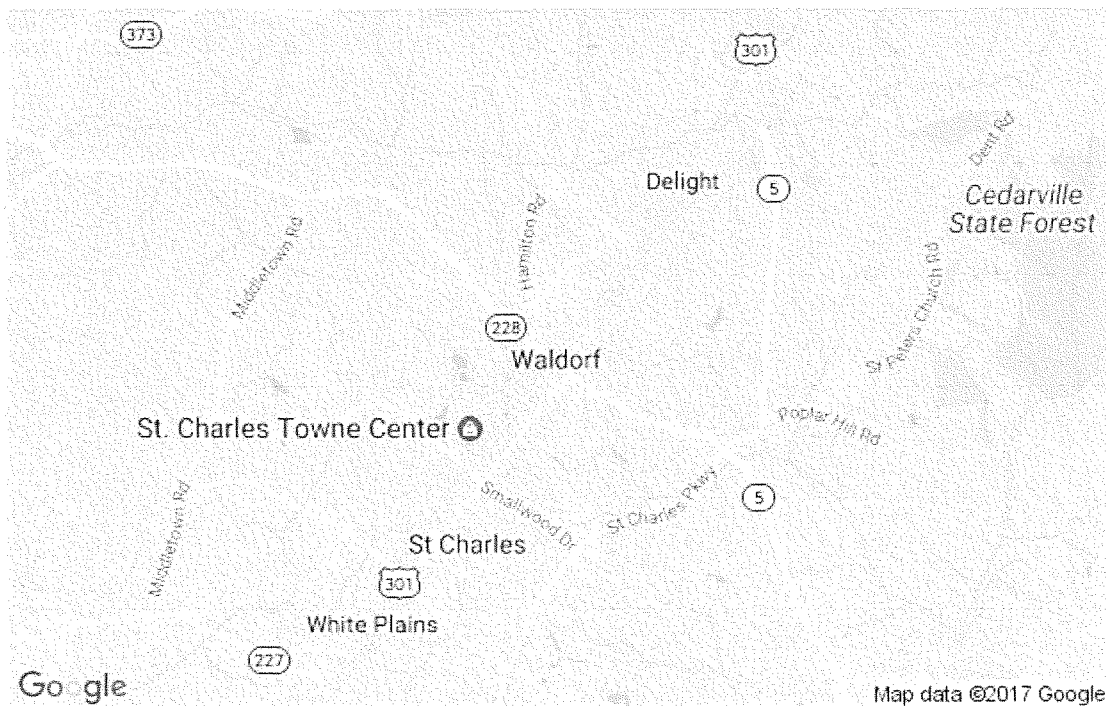
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Washington, DC - CW (WDCW)	SD HD	50
Washington, DC - FOX (WTTG)	SD HD	5
Washington, DC - IND (CNWS)	SD	8
Washington, DC - IND (WDVM)	SD HD	25
Washington, DC - IND (WJAL)	SD	68
Washington, DC - IND (WMDE)	SD HD	36
Washington, DC - ION (WPXW)	SD HD	66
Washington, DC - MNT (WDCA)	SD HD	20
Washington, DC - NBC (WRC)	SD HD	4
Washington, DC - PBS (WETA)	SD HD	26
Washington, DC - PBS (WFPT)	SD HD	62
Washington, DC - PBS (WHUT)	SD HD	32
Washington, DC - UNVSN (WFDC)	SD HD	14

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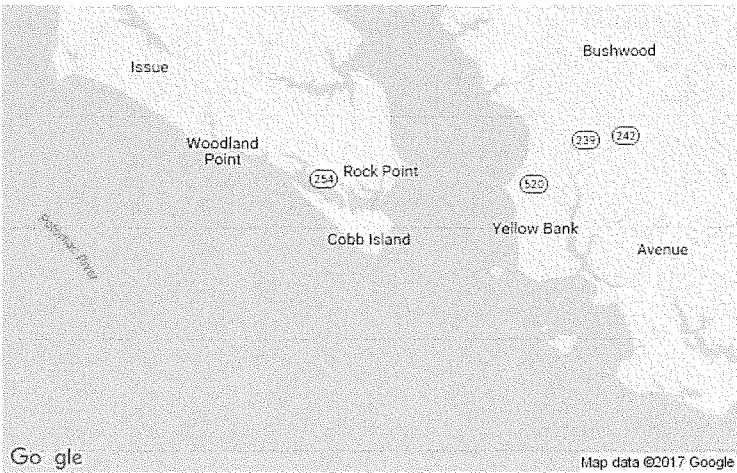
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Washington, DC - CW (WDCW)	SD HD	50
Washington, DC - FOX (WTTG)	SD HD	5
Washington, DC - IND (CNWS)	SD	8
Washington, DC - IND (WDVM)	SD HD	25
Washington, DC - IND (WJAL)	SD	68
Washington, DC - IND (WMDE)	SD HD	36
Washington, DC - ION (WPXW)	SD HD	66
Washington, DC - MNT (WDCA)	SD HD	20
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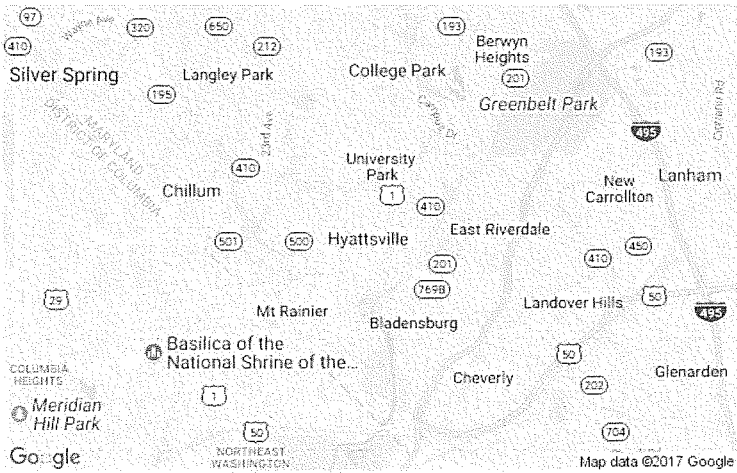
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Local channels

Station		Local Channel Number
Washington, DC - ABC (WJLA)	SD HD	7
Washington, DC - CBS (WUSA)	SD HD	9
Washington, DC - CW (WDCW)	SD HD	50
Washington, DC - FOX (WTTG)	SD HD	5
Washington, DC - IND (CNWS)	SD	8
Washington, DC - IND (WDVM)	SD HD	25
Washington, DC - IND (WJAL)	SD	68
Washington, DC - IND (WMDE)	SD HD	36
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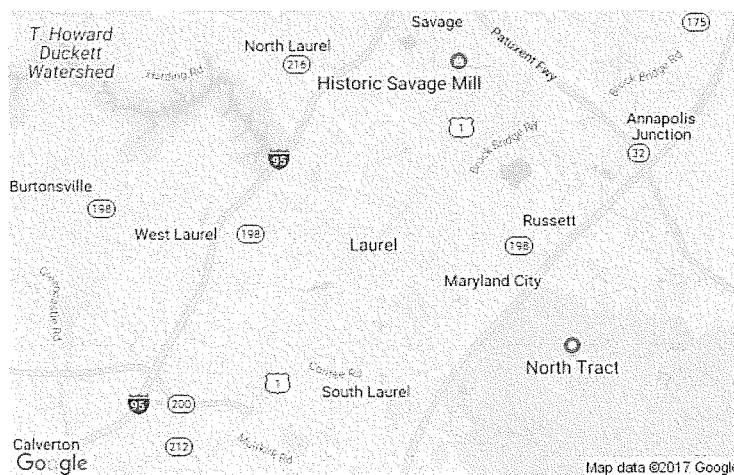
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Station		Local Channel Number
Washington, DC - ABC (WJLA)	SD HD	7
Washington, DC - CBS (WUSA)	SD HD	9
Washington, DC - CW (WDCW)	SD HD	50
Washington, DC - FOX (WTTG)	SD HD	5
Washington, DC - IND (CNWS)	SD	8
Washington, DC - IND (WDVM)	SD HD	25
Washington, DC - IND (WJAL)	SD	68
Washington, DC - IND (WMDE)	SD HD	36
Washington, DC - ION (WPXW)	SD HD	66
Washington, DC - MNT (WDCA)	SD HD	20
Washington, DC - NBC (WRC)	SD HD	4
Washington, DC - PBS (WETA)	SD HD	26
Washington, DC - PBS (WFPT)	SD HD	62
Washington, DC - PBS (WHUT)	SD HD	32
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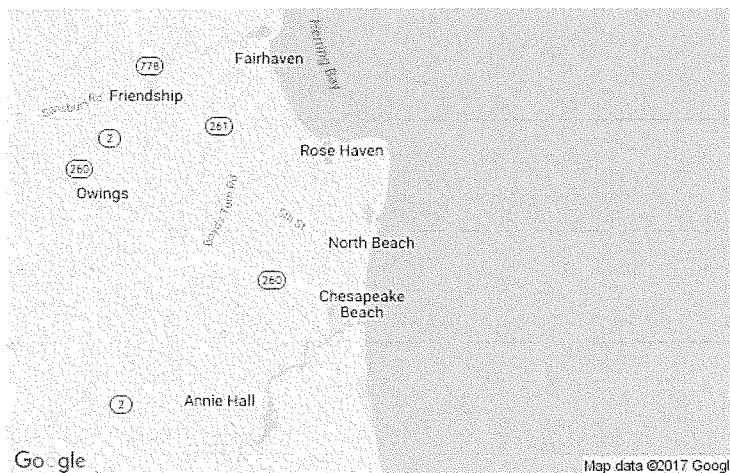
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#### Local channels

Station		Local Channel Number
Washington, DC - ABC (WJLA)	SD HD	7
Washington, DC - CBS (WUSA)	SD HD	9
Washington, DC - CW (WDCW)	SD HD	50
Washington, DC - FOX (WTTG)	SD HD	5
Washington, DC - IND (CNWS)	SD	8
Washington, DC - IND (WDVM)	SD HD	25
Washington, DC - IND (WJAL)	SD	68
Washington, DC - IND (WMDE)	SD HD	36
Washington, DC - ION (WPXW)	SD HD	66
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Station		Local Channel Number
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Washington, DC - CBS (WUSA)	SD HD	9
Washington, DC - CW (WDCW)	SD HD	50
Washington, DC - FOX (WTTG)	SD HD	5
Washington, DC - IND (CNWS)	SD	8
Washington, DC - IND (WDVM)	SD HD	25
Washington, DC - IND (WJAL)	SD	68
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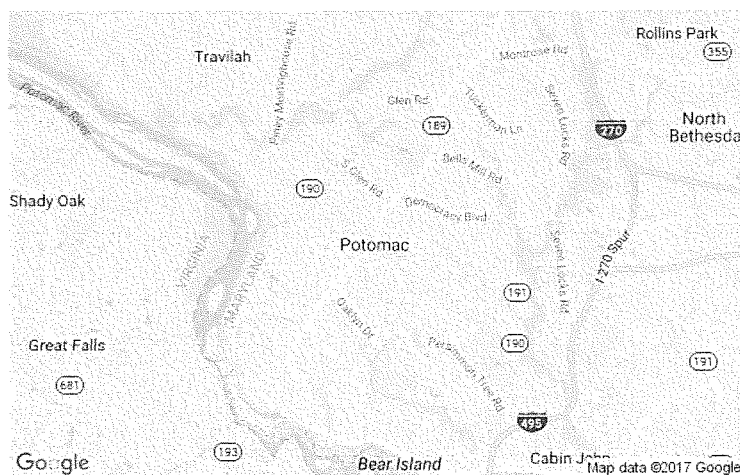
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Washington, DC - FOX (WTTG)  
Washington, DC - IND (CNWS)  
Washington, DC - IND (WDVM)  
Washington, DC - IND (WJLA)  
Washington, DC - IND (WMDE)  
Washington, DC - ION (WPXW)  
Washington, DC - MNT (WDCA)  
Washington, DC - NBC (WRC)  
Washington, DC - PBS (WETA)  
Washington, DC - PBS (WFPT)  
Washington, DC - PBS (WHUT)  
Washington, DC - UNVSN (WFDC)

**SD HD** 7  
**SD HD** 9  
**SD HD** 50  
**SD HD** 5  
**SD** 8  
**SD HD** 25  
**SD** 68  
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**SD HD** 66  
**SD HD** 20  
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**SD HD** 26  
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Washington, DC - CW (WDCW)	SD HD	50
Washington, DC - FOX (WTTG)	SD HD	5
Washington, DC - IND (CNWS)	SD	8
Washington, DC - IND (WDVM)	SD HD	25
Washington, DC - IND (WJAL)	SD	68
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Washington, DC - CBS (WUSA)	SD HD	9
Washington, DC - CW (WDCW)	SD HD	50
Washington, DC - FOX (WTTG)	SD HD	5
Washington, DC - IND (CNWS)	SD	8
Washington, DC - IND (WDVM)	SD HD	25
Washington, DC - IND (WJAL)	SD	68
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Washington, DC - ION (WPXW)	SD HD	66
Washington, DC - MNT (WDCA)	SD HD	20
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Washington, DC - PBS (WFPT)	SD HD	62
Washington, DC - PBS (WHUT)	SD HD	32
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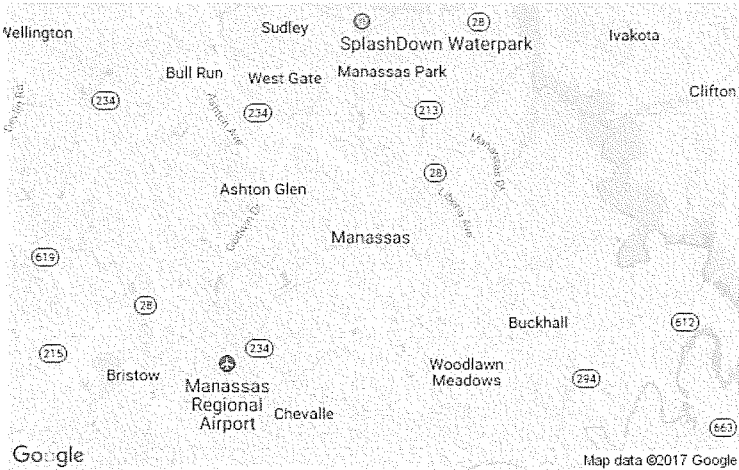
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Station		Local Channel Number
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Washington, DC - CBS (WUSA)	SD HD	9
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or call 1-844-625-8247

\*Local channels for non-qualifying packages are \$10.00 per month. Call 1-888-884-2741 for additional details.  
\*\* With qualifying package. Call 1-888-884-2741 for additional details.



OFFERS

Call DISH

CHAT

## Find local channels & programming in your area

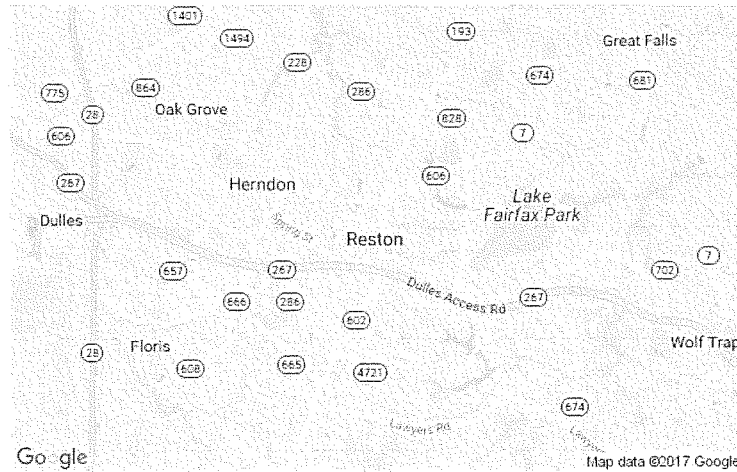
### RESTON, VA

#### Not the location you were looking for?

If this is not the location you were looking for or to see a more accurate listing of local channels, you may enter your full address below.

Street Address: City: State: Zip Code: 

Search



Call Now  
1-844-625-8247

#### Local channels

Station		Local Channel Number
Washington, DC - ABC (WJLA)	3D HD	7
Washington, DC - CBS (WUSA)	3D HD	9
Washington, DC - CW (WDCW)	3D HD	50
Washington, DC - FOX (WTTG)	3D HD	5
Washington, DC - IND (CNWS)	3D	8
Washington, DC - IND (WDVM)	3D HD	25
Washington, DC - IND (WJLA)	3D	68
Washington, DC - IND (WMDE)	3D HD	36
Washington, DC - ION (WPXW)	3D HD	66
Washington, DC - MNT (WDCA)	3D HD	20
Washington, DC - NBC (WRC)	3D HD	4
Washington, DC - PBS (WETA)	3D HD	26
Washington, DC - PBS (WFPT)	3D HD	62
Washington, DC - PBS (WHUT)	3D HD	32
Washington, DC - UNVSN (WFDC)	3D HD	14

Order Now  
or call **1-844-625-8247**

#### SPORTS NETWORKS

Regional and Collegiate Sports Networks are available with America's Top 120 Plus or higher. [Learn More](#)

#### Station

MASN

CSN Mid-Atlantic

Order Now  
or call **1-844-625-8247**

\*Local channels for non-qualifying packages are \$10.00 per month. Call 1-888-884-2741 for additional details.

\*\* With qualifying package. Call 1-888-884-2741 for additional details.


[OFFERS](#)
[Call DISH](#)
[CHAT](#)

## Find local channels & programming in your area

### ALEXANDRIA, VA

#### Not the location you were looking for?

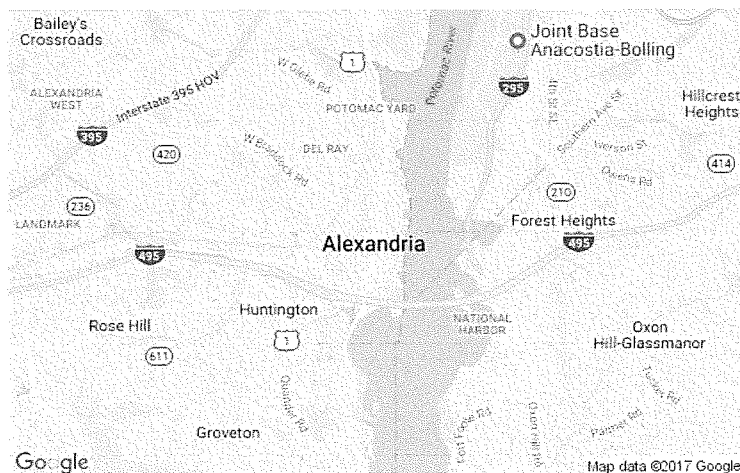
If this is not the location you were looking for or to see a more accurate listing of local channels, you may enter your full address below.

 Street Address: 

 City: 

 State: 

 Zip Code: 



Call Now  
1-844-625-8247

#### Local channels

Station		Local Channel Number
Washington, DC - ABC (WJLA)	SD HD	7
Washington, DC - CBS (WUSA)	SD HD	9
Washington, DC - CW (WDCW)	SD HD	50
Washington, DC - FOX (WTTG)	SD HD	5
Washington, DC - IND (CNWS)	SD	8
Washington, DC - IND (WDVM)	SD HD	25
Washington, DC - IND (WJAL)	SD	68
Washington, DC - IND (WMDE)	SD HD	36
Washington, DC - ION (WPXW)	SD HD	66
Washington, DC - MNT (WDCA)	SD HD	20
Washington, DC - NBC (WRC)	SD HD	4
Washington, DC - PBS (WETA)	SD HD	26
Washington, DC - PBS (WFPT)	SD HD	62
Washington, DC - PBS (WHUT)	SD HD	32
Washington, DC - UNVSN (WFDC)	SD HD	14

Order Now  
or call **1-844-625-8247**

#### SPORTS NETWORKS

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#### Station

MASN

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Order Now  
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\*\* With qualifying package. Call 1-888-884-2741 for additional details.



OFFERS

Call DISH

CHAT

## Find local channels & programming in your area

### FORT MYER, VA

#### Not the location you were looking for?

If this is not the location you were looking for or to see a more accurate listing of local channels, you may enter your full address below.

Street Address: City: State: Zip Code: 

Search



Call Now  
1-844-625-8247

#### Local channels

Station	Local Channel Number
Washington, DC - ABC (WJLA)	SD HD 7
Washington, DC - CBS (WUSA)	SD HD 9
Washington, DC - CW (WDCW)	SD HD 50
Washington, DC - FOX (WTTG)	SD HD 5
Washington, DC - IND (CNWS)	SD 8
Washington, DC - IND (WDVM)	SD HD 25
Washington, DC - IND (WJAL)	SD 68
Washington, DC - IND (WMDE)	SD HD 36
Washington, DC - ION (WPXW)	SD HD 66
Washington, DC - MNT (WDCA)	SD HD 20
Washington, DC - NBC (WRC)	SD HD 4
Washington, DC - PBS (WETA)	SD HD 26
Washington, DC - PBS (WFPT)	SD HD 62
Washington, DC - PBS (WHUT)	SD HD 32
Washington, DC - UNVSN (WFDC)	SD HD 14

Order Now  
or call **1-844-625-8247**

#### SPORTS NETWORKS

Regional and Collegiate Sports Networks are available with America's Top 120 Plus or higher. [Learn More](#)

#### Station

MASN

CSN Mid-Atlantic

Order Now  
or call **1-844-625-8247**

\*Local channels for non-qualifying packages are \$10.00 per month. Call 1-888-884-2741 for additional details.

\*\* With qualifying package. Call 1-888-884-2741 for additional details.





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## Find local channels & programming in your area

### WASHINGTON, DC

#### Not the location you were looking for?

If this is not the location you were looking for or to see a more accurate listing of local channels, you may enter your full address below.

Street Address:

City:

State:

Zip Code:



Call Now  
1-844-310-6846

#### Local channels

Station		Local Channel Number
Washington, DC - ABC (WJLA)	SD HD	7
Washington, DC - CBS (WUSA)	SD HD	9
Washington, DC - CW (WDCW)	SD HD	50
Washington, DC - FOX (WTTG)	SD HD	5
Washington, DC - IND (CNWS)	SD	8
Washington, DC - IND (WDVM)	SD HD	25
Washington, DC - IND (WJAL)	SD	68
Washington, DC - IND (WMDE)	SD HD	36
Washington, DC - ION (WPXW)	SD HD	66
Washington, DC - MNT (WDCA)	SD HD	20
Washington, DC - NBC (WRC)	SD HD	4
Washington, DC - PBS (WETA)	SD HD	26
Washington, DC - PBS (WFPT)	SD HD	62
Washington, DC - PBS (WHUT)	SD HD	32
Washington, DC - UNVSN (WFDC)	SD HD	14

Order Now  
or call **1-844-310-6846**

#### SPORTS NETWORKS

Regional and Collegiate Sports Networks are available with America's Top 120 Plus or higher. [Learn More](#)

#### Station

MASN

CSN Mid-Atlantic

Order Now  
or call **1-844-310-6846**

\*Local channels for non-qualifying packages are \$10.00 per month. Call 1-888-884-2741 for additional details.

\*\* With qualifying package. Call 1-888-884-2741 for additional details.

## **EXHIBIT C**

# WJAL-TV's

836,000 Cable Homes & Dish  
Network Satellite Homes

## In Maryland:

	System	Channel	Households
<b>Frederick</b> , Adamstown, Braddock Hts., Brunswick, Burkittsville, Emmittsburg, Ft. Detrick, Jefferson, Libertytown, Middletown, Myersville, Mt. Airy, Mt. Pleasant, New Market, Point of Rocks, Rosemont, Urbana, Walkersville, Woodsboro (Carroll and Frederick)	Comcast	24	61,200
<b>Hagerstown</b> , Funkstown, Williamsport, Boonsboro, Clear Spring, Chewsville, Halfway, Pinesburg (Washington)	Regional	8	9,160
<b>Cumberland</b> , LaVale, Bowling Green, Corriganville, Eckhart, Eilerslie, Mt. Savage, Potomac Park (Allegany)	Atlantic Broadband	15	24,780
Frostburg, Lonaconing, Midland, Midlothian, Morgantown, Carlos, Klondike, National, Woodland, Zihlman (Allegany)	Comcast	14	8,254
<b>Hancock</b> (Washington)	Comcast	13	2,909
Thurmont (Frederick)	Comcast	24	2,686
Smithsburg, Halfway, Maugansville (Washington)	Regional	8	2,310
Boonsboro (Washington)	Regional	8	2,333
Sharpsburg, Keedysville (Washington)	Comcats	18	683
Fort Ritchie (Washington)	Comcast	35	455
Cascade, Highfield, Pen Mar (Washington)	Comcast	6	
Luke, Westport (Allegany) Broadband	Atlantic	2	870

## In Pennsylvania:

<b>Chambersburg</b> , Fayetteville, Greene, Guilford, Hamilton, Letterkenny (Franklin); Shippensburg, Mainsville, Mifflin, Newville, Southampton, Pennsboro (Franklin and Cumberland)	Comcast	2	40,432
<b>Waynesboro</b> , Blue Ridge Summit, Mont Alto, Rouzerville, Edenville, Guilford, Quincy, Hamilton, Wayne Heights, Zullinger (Franklin)	Comcast	6	10,900
<b>Greencastle</b> , Shady Grove, State Line, Cumberland, Montgomery, Peters, Antrim Township (Franklin)	Comcast	10	6,190
McConnellsburg, Mercersburg, Ft. Loudon, Peters, Todd, Ayr, St. Thomas (Fulton)	Comcast	2	4,179
<b>Gettysburg</b> , Arentsville, Bendersville, Butler, Comcast Cross Roads, Codorus, Cumberland, Dover, Fairfield, Franklin, Freedom, German, Hamilton, Huntingdon, Latimore, Liberty, Menallen, Mt. Joy, Mt. Pleasant, Hopewell, Oxford, Reading, Straban, Union (Adams); Carroll Valley, Chanceford, Manheim, Paradise, Peach Bottom, Shrewsbury, Springfield, Warrington, Washington, Windsor, York Springs (York)		24	41,900
Biglerville, Butler, Gettysburg, Cumberland High Rock (Adams)	Comcast	27	8,387
Bonneauville, E. Berlin, Littlestown, New Oxford (Adams)	Comcast	24	6,620
Fort Loudon, St. Thomas, Peters (Franklin)	Comcast	2	1,533

## In Pennsylvania (continued):

	System	Channel	Households
Dillsburg (Adams), Carroll, Franklin (York); Comcast Latimore, Monaghan, Monroe (Cumberland)		24	26,000 <sup>1</sup>
Walnut Bottom, Newburg, Newton, Hopewell, Penn. (Cumberland); Letterkenny, Southampton Orrstown, (Franklin)	Kuhn Comm's	23	1,480
Calvin, Cassville, Todd, Union Township (Huntingdon)	Calvin Cable	27	871
Broad Top City, Hopewell, Langdondale (Bedford)	Broad Top Mt.	12	759
Hazleton, Three Springs (Huntingdon)	County Cable	27	400
Spring Run, Dry Run (Franklin)	Spring Run	17	331
Fannettsburg, Huntingdon, Metal, Willow Hill (Franklin)	Fannettsburg	14	325
Mapleton Depot (Huntingdon)	Mapleton TV	21	244
Orbisonia, Shade Gap (Huntingdon)	Orbisonia	27	226
Fannettsburg (Fulton)	Valley Cable 14		179
Allensville (Huntingdon)	Valley Cable	14	100
East Waterford (Juniata)	Valley Cable	2	96
Burnt Cabins (Huntingdon)	Burnt Cabins	14	85
Doyleburg, Fannet Township (Franklin)	Valley Cable	9	86
Neelyton, Dublin Township (Huntingdon)	Valley Cable	12	45
Blairs Mills, Tell Township (Blair and Huntingdon)	Valley Cable	7	31
Centerville, Londonderry, Southampton, Cumberland (Bedford) (See Cumberland System)	Atlantiv Broadband		

## In Virginia:

Winchester, Berryville, Boyce, Middletown, Stephens City (Frederick)	Comcast	23	24,360
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## In West Virginia:

<b>Martinsburg</b> , Berkeley (Berkeley)	Comcast	23	27,210
<b>Charles Town</b> , Bolivar, <b>Harpers Ferry</b> , Ranson, Shenandoah Junction, <b>Shepherdstown</b> (Jefferson)	Comcast	24	7,220
Berkeley, <b>Berkeley Springs</b> , <b>Hedgesville</b> , Inwood, Falling Waters, Bedington, Marlowe (Berkeley); <b>Great Cacapon</b> (Morgan)	Comcast	13	4,960
<b>Keyser</b> , Peidmont, Ridgeley, Ft. Ashby, Wiley Ford, Carpendale (Mineral)	Comcast	14	12,277
<b>Romney</b> (Hampshire)	Comcast	14	1,417
Capon Bridge (Hampshire); Wardensville (Hardy)	Valley Cable	14	620
Augusta, North River Mills, Shanks (Hampshire)	Tele-Media	14	345

Last updated 04/24/96. SOURCES: Nielsen Station Index, Nielsen Cable On-Line Data Exchange, TV & Cable Facebook, systems themselves. If number of subs is blank, then the number of subs are incorporated elsewhere here. Parentheses indicate Counties reached. Dillsburg still under buildouts by GS Communications. Overall number

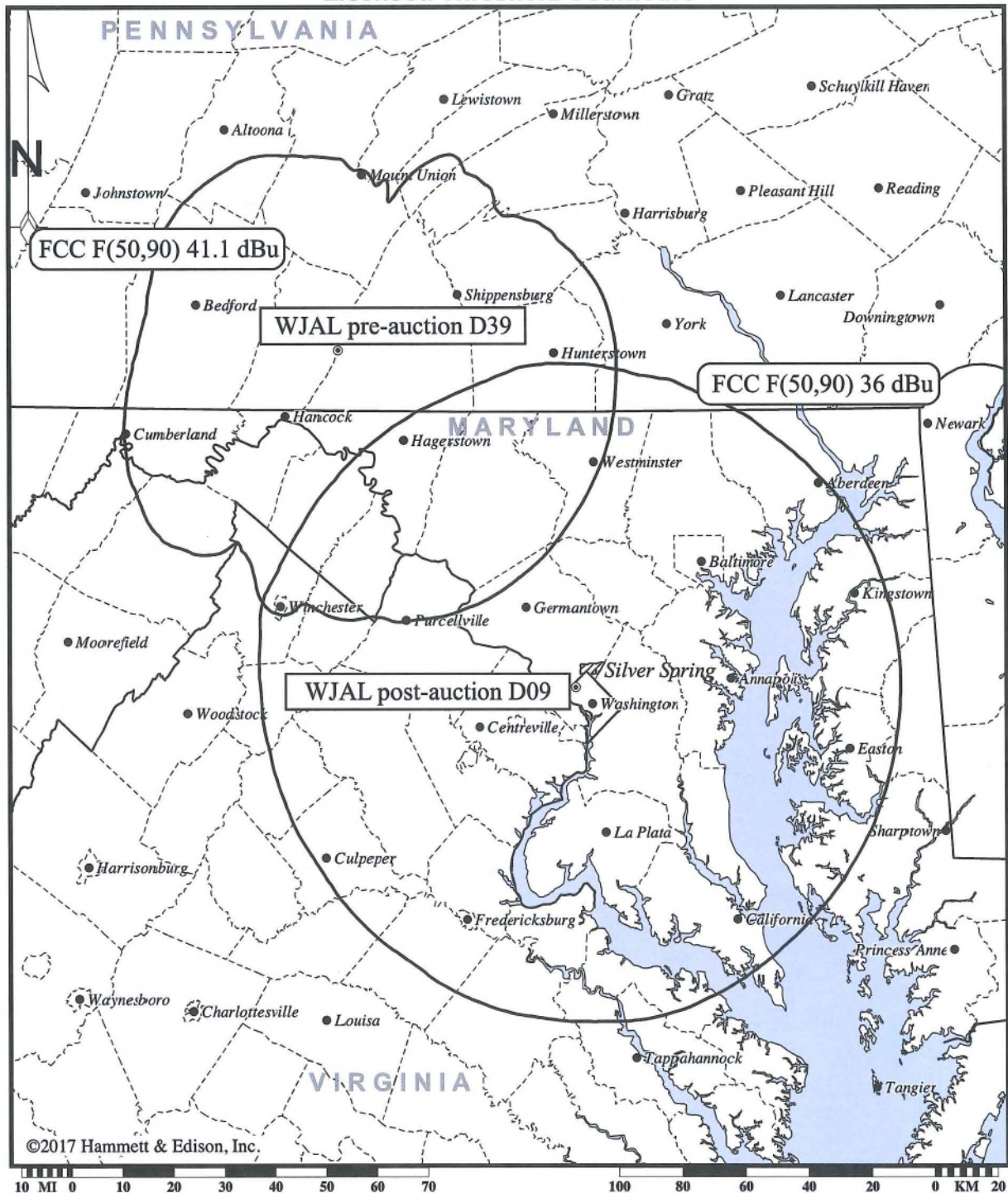
## **EXHIBIT D**

**TV Station WJAL • Post-Auction Channel 9 • Silver Spring, Maryland  
(Shared with TV Station WUSA)**

**vs.**

**TV Station WJAL • Pre-Auction Channel 39 • Hagerstown, Maryland**

**Licensed Threshold Countours**



Albers equal area map projection. Map data taken from Sectional Aeronautical Charts, published by the National Ocean Survey. City names, city limits, county and state lines shown taken from U.S. Census Bureau TIGER/Line 2010 data.



**HAMMETT & EDISON, INC.**  
CONSULTING ENGINEERS  
SAN FRANCISCO

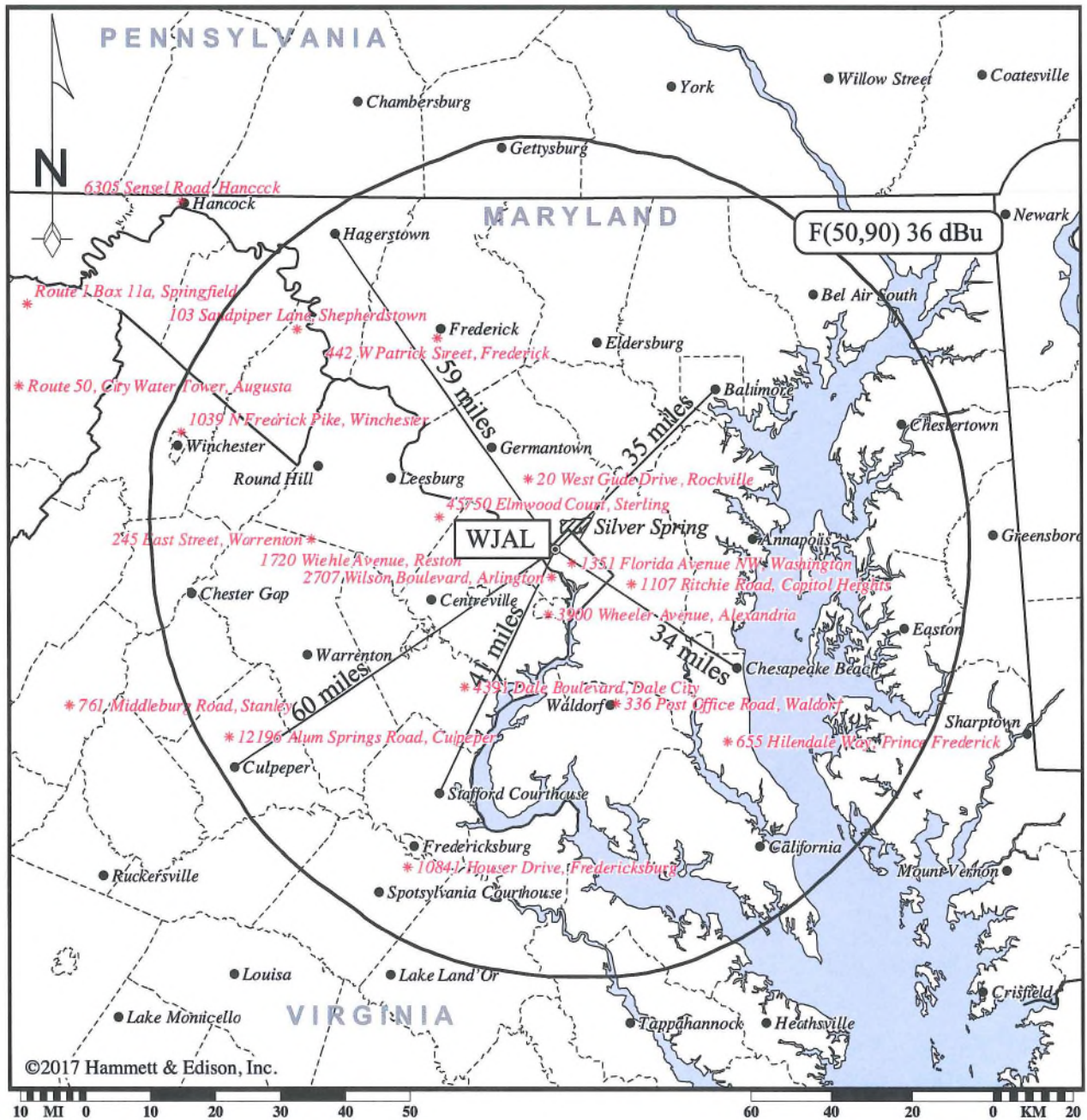
WJAL  
November 6, 2017

**EXHIBIT E**



**TV Station WJAL • Post-Auction Channel 9 • Silver Spring, Maryland  
(Shared with TV Station WUSA)**

**Licensed Threshold Contour with Comcast Headend Locations (in Red)**



Albers equal area map projection. Map data taken from Sectional Aeronautical Charts, published by the National Ocean Survey. City names, city limits, county and state lines shown taken from U.S. Census Bureau TIGER/Line 2010 data.



**HAMMETT & EDISON, INC.**  
CONSULTING ENGINEERS  
SAN FRANCISCO

Comcast  
November 6, 2017

## **EXHIBIT F**



**STATION WJAL(TV), SILVER SPRING, MARYLAND:  
Transmitter Site – Comcast Community Distances<sup>1</sup>**

**Comcast of Maryland, LLC: Charles County and St. Mary's County System,  
 Prince George's County System, and Calvert County System**

average distance: 17.3 miles  
 median distance: 12 miles

CUID	Community Name	Distance From Transmitter Site to Community (Miles)
MD0196	Bryans Road	22
MD0178	Charles	30
MD0267	Cobb Island	50
MD0177	Indian Head	26
MD0352	La Plata	30
MD0176	La Plata Town	30
MD0033	St. Charles	26
MD0351	U.S. Navel Ord. Station-Indian Head	25
MD0263	Waldorf	25
MD0279	St. Mary's	70
MD0140	Hyattsville	7
MD0141	Bladensburg	8
MD0142	Berwyn Heights	10
MD0143	College Park	8
MD0144	Cottage City	7
MD0145	Edmonston	8
MD0146	Glenarden	12
MD0147	Landover Hills	10
MD0148	Mount Rainier	6
MD0149	North Brentwood	7
MD0150	Riverdale	8
MD0151	University Park	8
MD0163	Prince George's	16
MD0165	District Heights	12
MD0167	Upper Marlboro	20
MD0171	New Carrollton	11
MD0172	Prince George's (N)	16
MD0173	Greenbelt	12

<sup>1</sup> These distances were calculated using Google Maps and are reported as the crow flies.

MD0174	Cheverly	9
MD0181	Seat Pleasant	10
MD0182	Fairmont Heights	10
MD0183	Capitol Heights	10
MD0184	Morningside	13
MD0185	Forest Heights	11
MD0186	Andrews AFB	15
MD0200	Bowie	16
MD0201	Laurel	16
MD0220	Brentwood	7
MD0221	Colmar Manor	7
MD0383	Takoma Park	4
MD0388	Beltsville	11
MD0389	Seabrook	12
MD0390	Lanham	12
MD0391	Montpelier	15
MD0250	Calvert	44
MD0255	Chesapeake Beach	34
MD0256	North Beach	35

# Comcast of Potomac, LLC: Montgomery County System and Arlington County System

average distance: 8.6 miles

median distance: 5 miles

CUID	Community Name	Distance From Transmitter Site to Community (Miles)
MD0057	Gaithersburg	14
MD0222	Rockville	10
MD0223	Chevy Chase	3
MD0224	Silver Spring	4
MD0225	Washington Grove	14
MD0226	Takoma Park	5
MD0227	Somerset	1
MD0228	Poolesville	23
MD0229	Barnesville	25
MD0230	Brookeville	16
MD0231	Garrett Park	6
MD0233	Glen Echo	4
MD0234	Kensington	5
MD0235	Laytonsville	18
MD0236	Montgomery	16
MD0274	Chevy Chase	3
MD0275	Chevy Chase Sect IV	3
MD0276	Chevy Chase Sect V	2
MD0277	Chevy Case Village	1
MD0340	Germantown	18
MD0341	Burtonsville	13
MD0342	Potomac	8
MD0343	Boyd's	20
MD0344	Wheaton	6
MD0345	Derwood	12
MD0346	Olney	14
MD0347	Cabin John	5
MD0348	Bethesda	3
MD0349	West Bethesda	4
MD0465	North Chevy Chase Village	3
MD0466	Chevy Chase View	5
MD0467	Martins Additions Village	2
MD0472	Chevy Chase village Section 3	2
VA0108	Arlington	5

**Comcast of Virginia, Inc.: Prince William County and Fairfax County System,  
Reston – Fairfax County System, Alexandria – Arlington County System,  
Fort Myer – Arlington County System, Loudoun County System,  
Stafford County System and Spotsylvania County System**

average distance: 29.4 miles

median distance: 31 miles

CUID	Community Name	Distance From Transmitter Site to Community (Miles)
VA0019	Prince William (ETN)	31
VA0173	Quantico	31
VA0241	Prince William	31
VA0242	Quantico	31
VA0267	Fort Belvoir	16
VA0280	Dumfries	30
VA0287	Lake Ridge	22
VA0315	Manassas Park	24
VA0329	Manassas Park	24
VA0362	Prince William (W)	31
VA0377	Occoquan	21
VA0362	Manassas	25
VA0432	Gainesville	31
VA0433	Haymarket	32
VA0595	Dale City	25
VA0596	Triangle	31
VA0597	Woodbridge	22
VA0616	Prince William	32
VA0617	Prince William (E)	32
VA0046	Reston	15
VA0220	Alexandria	10
VA0373	Fort Myer	5
VA0255	Leesburg	28
VA0332	Loudoun	32
VA0567	Purcellville	36
VA0568	Middleburg	35
VA0569	Round Hill	39
VA0570	Hamilton	33
VA0571	Lovettsville	37
VA0311	Stafford	40
VA0283	Spotsylvania	59
VA0818	Fredericksburg	49

**Comcast of the District, LLC: District of Columbia System**

average distance: 4.75 miles

median distance: 4 miles

CUID	Community Name	Distance From Transmitter Site to Community (Miles)
DC	Washington	4
DC	US Soldiers Home	4
DC	Marine Barracks	7
DC	Walter Reed Med Ctr	4

## **EXHIBIT G**

**STATION WJAL(TV), SILVER SPRING, MARYLAND:**  
**Community of License – Comcast Community Distances**

**Comcast of Maryland, LLC: Charles County and St. Mary's County System,  
Prince George's County System, and Calvert County System<sup>1</sup>**

average distance: 22 miles  
median distance: 16 miles

CUID	Community Name	Distance From Silver Spring, Maryland to Community (Miles)
MD0196	Bryans Road	32
MD0178	Charles	41
MD0267	Cobb Island	71
MD0177	Indian Head	36
MD0352	La Plata	40
MD0176	La Plata Town	40
MD0033	St. Charles	40
MD0351	U.S. Navel Ord. Station-Indian Head	37
MD0263	Waldorf	34
MD0279	St. Mary's	89
MD0140	Hyattsville	6
MD0141	Bladensburg	8
MD0142	Berwyn Heights	7
MD0143	College Park	6
MD0144	Cottage City	7
MD0145	Edmonston	7
MD0146	Glenarden	12
MD0147	Landover Hills	15
MD0148	Mount Rainier	6
MD0149	North Brentwood	6
MD0150	Riverdale	6
MD0151	University Park	6
MD0163	Prince George's	27
MD0165	District Heights	22
MD0167	Upper Marlboro	26
MD0171	New Carrollton	14
MD0172	Prince George's (N)	27
MD0173	Greenbelt	11

<sup>1</sup> These distances were calculated using Google Maps and are reported in driving miles.

MD0174	Cheverly	9
MD0181	Seat Pleasant	19
MD0182	Fairmont Heights	18
MD0183	Capitol Heights	19
MD0184	Morningside	21
MD0185	Forest Heights	15
MD0186	Andrews AFB	23
MD0200	Bowie	16
MD0201	Laurel	15
MD0220	Brentwood	6
MD0221	Colmar Manor	7
MD0383	Takoma Park	2
MD0388	Beltsville	9
MD0389	Seabrook	14
MD0390	Lanham	13
MD0391	Montpelier	16
MD0250	Calvert	56
MD0255	Chesapeake Beach	44
MD0256	North Beach	45



**Comcast of Potomac, LLC: Montgomery County System and Arlington County System**

average distance: 11 miles  
median distance: 7.5 miles

CUID	Community Name	Distance From Silver Spring, Maryland to Community (Miles)
MD0057	Gaithersburg	18
MD0222	Rockville	13
MD0223	Chevy Chase	4
MD0224	Silver Spring	0
MD0225	Washington Grove	18
MD0226	Takoma Park	2
MD0227	Somerset	6
MD0228	Poolesville	28
MD0229	Barnesville	33
MD0230	Brookeville	14
MD0231	Garrett Park	7
MD0233	Glen Echo	8
MD0234	Kensington	5
MD0235	Laytonsville	18
MD0236	Montgomery	19
MD0274	Chevy Chase	4
MD0275	Chevy Chase Sect IV	4
MD0276	Chevy Chase Sect V	4
MD0277	Chevy Case Village	5
MD0340	Germantown	22
MD0341	Burtonsville	11
MD0342	Potomac	14
MD0343	Boys	28
MD0344	Wheaton	4
MD0345	Derwood	19
MD0346	Olney	12
MD0347	Cabin John	12
MD0348	Bethesda	5
MD0349	West Bethesda	6
MD0465	North Chevy Chase Village	5
MD0466	Chevy Chase View	6
MD0467	Martins Additions Village	4
MD0472	Chevy Chase village Section 3	5
VA0108	Arlington	12

**Comcast of Virginia, Inc.: Prince William County and Fairfax County System,  
Reston – Fairfax County System, Alexandria – Arlington County System,  
Fort Myer – Arlington County System, Loudoun County System,  
Stafford County System, and Spotsylvania County System**

average distance: 41.2 miles  
median distance: 42 miles

CUID	Community Name	Distance From Transmitter Site to Community (Miles)
VA0019	Prince William (ETN)	42
VA0173	Quantico	44
VA0241	Prince William	42
VA0242	Quantico	44
VA0267	Fort Belvoir	30
VA0280	Dumfries	39
VA0287	Lake Ridge	33
VA0315	Manassas Park	36
VA0329	Manassas Park	36
VA0362	Prince William (W)	42
VA0377	Occoquan	30
VA0362	Manassas	38
VA0432	Gainesville	42
VA0433	Haymarket	44
VA0595	Dale City	35
VA0596	Triangle	39
VA0597	Woodbridge	29
VA0616	Prince William	42
VA0617	Prince William (E)	42
VA0046	Reston	25
VA0220	Alexandria	15
VA0373	Fort Myer	13
VA0255	Leesburg	43
VA0332	Loudoun	48
VA0567	Purcellville	51
VA0568	Middleburg	50
VA0569	Round Hill	54
VA0570	Hamilton	48
VA0571	Lovettsville	48
VA0311	Stafford	57
VA0283	Spotsylvania	80
VA0818	Fredericksburg	60

**Comcast of the District, LLC: District of Columbia System**

average distance: 5 miles

median distance: 5 miles

CUID	Community Name	Distance From Transmitter Site to Community (Miles)
DC	Washington	6
DC	US Soldiers Home	4
DC	Marine Barracks	9
DC	Walter Reed Med Ctr	1


**Comcast of the District, LLC: District of Columbia System**

average distance: 4.75 miles

median distance: 4 miles

CUID	Community Name	Distance From Transmitter Site to Community (Miles)
DC	Washington	4
DC	US Soldiers Home	4
DC	Marine Barracks	7
DC	Walter Reed Med Ctr	4

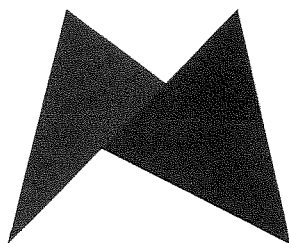
## **EXHIBIT H**

							<b>1ST QTR 2017 PROGRAM SCHEDULE</b>						
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY							
HAYAS EDGE													
CELEBRITY PAGE							ANIMAL RESCUE	PRODUCT SHOWCASE				12:00 AM	
JACK HANNA'S ANIMAL ADVENTURES							ANIMAL EXPLORATION	PRODUCT SHOWCASE				12:30 AM	
THE JERRY SPRINGER SHOW							WILD AMERICA					1:00 AM-6:00 AM	
							WILD ABOUT ANIMALS	IN TOUCH MINISTRIES				6:00 AM	
							AQUA KIDS	PRODUCT SHOWCASE				6:30 AM	
							OCEAN MYSTERIES	A HOPE WORTH HAVING				7:00 AM	
							EXPEDITION	PRODUCT SHOWCASE				7:30 AM	
#1 MAURY #1							WILD BRAIN GAMES: FAMILY	EXPERIENCING LIFE TODAY				8:00 AM	
LAW & ORDER: CI							DOGTOWN: USA	CATHOLIC MASS				8:30 AM	
							RECIPE REHAB	DAILY LIVING				9:00 AM	
							HATCHED	EVER INCREASING FAITH				9:30 AM	
							PRODUCT SHOWCASE					10:00 AM	
							PRODUCT SHOWCASE					10:30 AM	
JOYCE MEYER ENJOYING EVERYDAY LIFE							LATINATION					11:00 AM	
LIFE TODAY WITH JAMES ROBISON							AMERICAN LATINO					11:30 AM	
							MADE IN					12:00 PM	
JUST FOR LAUGHS							PRODUCT SHOWCASE	PRODUCT SHOWCASE				12:30 PM	
							DESIGNING SPACES					1:00 PM	
							MILITARY MAKEOVER					1:30 PM	
							HOMETIME					2:00 PM	
							TODAY'S HOMEOWNER	BONANZA				2:30 PM	
							HAZELTON'S HOUSE CALLS					3:00 PM	
JUDGE FAITH								PRODUCT SHOWCASE				3:30 PM	
												4:00 PM	
							WHACKED OUT SPORTS	PRODUCT SHOWCASE				4:30 PM	
								PRAYING TIME MINISTRIES				4:30 PM	
JUDGE ALEX												5:00 PM	

KING OF THE HILL	RACELINE		PRODUCT SHOWCASE	5:30 PM
	THE OUTDOORSMAN AN		HOUSE OF PRAYER	6:00 PM
FAMILY GUY	GAME ON		WELLNESS HOUR	6:30 PM
AMERICAN DAD	RAISING HOPE		GOD SMILES	7:00 PM
THE CLEVELAND SHOW	TEXAS MUSIC SCENE		MANNA-FEST	7:30 PM
RAISING HOPE	FAMILY GUY		BOB'S BURGER	8:00 PM
RULES OF ENGAGEMENT				8:30 PM
MOVIE	HAVEN	WHAT WENT DOWN	RULES OF ENGAGEMENT	9:00 PM
			LEADING THE WAY	9:30 PM
	MURDOCH MYSTERIES	AMERICAN NINJA WARRIOR	PRODUCT SHOWCASE	10:00 PM
COPS RELOADED		LEVERAGE		10:30 PM
				11:00 PM
				11:30 PM

## **EXHIBIT I**





MONTGOMERY COUNTY  
ECONOMIC DEVELOPMENT  
CORPORATION MARYLAND

ABOUT MCEDC    MOCO ADVANTAGE    QUALITY OF LIFE    GROW YOUR BUSINESS  
KEY INDUSTRIES    GO GLOBAL (/GO-GLOBAL-FROM-MOCO/)  
FIND A PROPERTY (/PROPERTIES/)    NEWS & EVENTS    CONNECT

# DC'S PLAYGROUND

## A DIVERSE AND VIBRANT COMMUNITY WELCOMES YOU

Montgomery County is a friendly, cosmopolitan place that's ideal to grow a business, raise a family and live the good life. The population is diverse and a common thread is the rich quality of life we offer — from award-winning restaurants and cultural gems to abundant parkland, excellent transportation and exceptional walkable communities.

1000000900

residents

restaurants

350

cultural  
groups

22

theaters

400

parks



## OUR COMMUNITIES

From vibrant, urban districts like Bethesda, Silver Spring, Kensington and Wheaton to rustic open living spaces in Darnestown and Poolesville, there is a neighborhood for everyone in Montgomery County. We have many mixed used, sustainable communities popping up like Pike & Rose, Downtown Crown, White Flint and White Oak. Our county seat, Rockville, combines historic charm with a growing business and retail district.

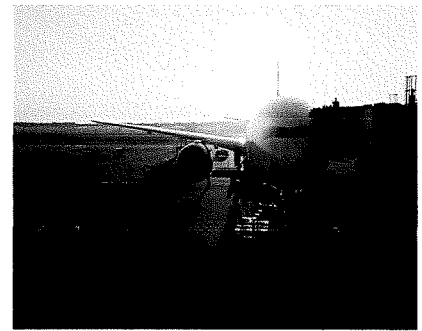
**LEARN MORE  
(/QUALITY/OUR-  
COMMUNITIES)**



## TOP SCHOOLS

Montgomery County is at the head of the class. Find out about the top universities located in the county, including specialized programs that are turning out more graduates in STEM disciplines and a skilled workforce. From K – 12, some of the top schools in the nation are located here. An impressive 36 schools in the county are National Blue Ribbon Schools.

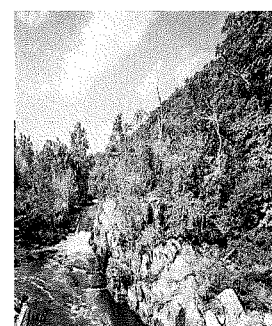
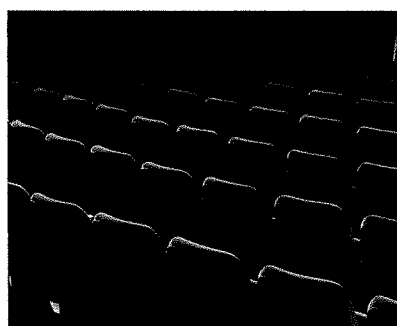
**LEARN MORE  
(/QUALITY/TOP-  
SCHOOLS)**



## TRANSPORTATION

With our convenient metro, trains, ride sharing and 3 international airports within a 30-mile radius, our transportation network makes it's easy to get down to business here. And we have a prominent next door neighbor, the nation's capital. In real estate, location matters. For business matters, see why Montgomery County is a prime choice.

**LEARN MORE  
(/QUALITY/TRANSPORTATION)**



## FOOD SCENE

In a culturally diverse area like Montgomery County, it is no wonder the restaurant scene is out of this world. From ethnic enclaves like Wheaton, Rockville and Gaithersburg to city districts like Bethesda and Silver Spring, there are dining options to delight every palate. Plus, farmer's markets bursting with fresh produce and farm-to-table great eats.

**LEARN MORE**  
(/QUALITY/FOOD-SCENE)

## ARTS & CULTURE

From the restored 1938 Art Deco AFI Silver Theater to Rockville's Strathmore Music Center, arts is alive and well in our community. Upper County in Germantown, find the outstanding BlackRock Center for the Arts. Olney Theatre Center has world-class productions while the Adventure Theater and Imagination Stage feed the imagination of children – the next generation of arts patrons.

**LEARN MORE**  
(/QUALITY/ARTS-CULTURE)

## PARKS & RECREATION

For biking, hiking, kayaking, fishing and swimming, find your path in Montgomery County. With 400 parks and 34 community recreation centers, find recreational opportunities that appeal to virtually every interest. Check out the Maryland SoccerPlex, abundant baseball fields and golf courses, and hockey venues (ice, air and field). A fun mix to get out and play!

**LEARN MORE**  
(/QUALITY/PARKS-RECREATION)

## CONNECT WITH US

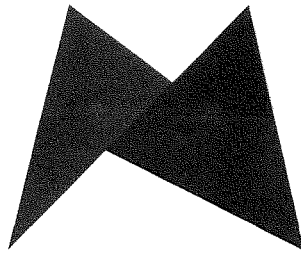
(http://connect.montgomerycountymd.gov)

SIGN UP FOR OUR NEWSLETTER (/connect#newsletter)

Search

**MONTGOMERY COUNTY ECONOMIC  
DEVELOPMENT CORPORATION**

1801 Rockville Pike, Suite 320



MONTGOMERY COUNTY  
ECONOMIC DEVELOPMENT  
CORPORATION MARYLAND

ABOUT MCEDC    MOCO ADVANTAGE    QUALITY OF LIFE    GROW YOUR BUSINESS  
KEY INDUSTRIES    GO GLOBAL (/GO-GLOBAL-FROM-MOCO/)  
FIND A PROPERTY (/PROPERTIES/)    NEWS & EVENTS    CONNECT

# TRANSPORTATION

FROM HERE, DO BUSINESS ANYWHERE

Planes, trains, metro, cars and bikes: business owners, employees and residents have excellent options for getting around town. In addition to our transportation network within the county, we are next-door neighbors with Washington, D.C. and perfectly situated halfway between Boston and Atlanta, one of the busiest business corridors.

## THREE INTERNATIONAL AIRPORTS WITHIN A 30-MILE RADIUS

Global business is big business in Montgomery County. We have three international airports with direct flights to many international destinations. And since more than 160 foreign-owned companies have North American headquarters in the county, this offers a big strategic advantage.

Baltimore/Washington International  
Thurgood Marshall **(BWI)**

Ronald Reagan Washington National  
**(DCA)**

Dulles International **(IAD)**

Also, Montgomery County Airpark in Gaithersburg provides convenient corporate and general aviation, offering a local alternative to regional transportation.

## METRORAIL

The rapid transit system of Washington, D.C. is Metro (<https://wmata.com/>), with hundreds of stops located throughout Montgomery County and across the greater Washington, D.C. areas.

*From Montgomery County, it's great to be able to go in and out from 3 different airports or the train. I can move really quickly and easily around the world when I need to.*

**Seth Goldman, Founder & CEO, Honest Tea, Bethesda Worldwide Headquarters**

## CAPITAL BIKESHARE

It's inexpensive and green! Montgomery County is part of the regional Capital Bikeshare system. Pick up a bike for quick and easy connections to home, work or job training. Rockville, Silver Spring, Gaithersburg, Takoma Park and Chevy Chase are among the participating communities. Find out about a new, free bikeshare program called MCLiberty (<https://www.montgomerycountymd.gov/DOT-DIR/commuter/bikesharingCSS.html>) for qualified participants at BikeShare (<https://www.montgomerycountymd.gov/DOT-DIR/commuter/bikesharingCSS.html>).



Metro buses and local Ride-On buses add to the mass transit options available throughout the county.



Courtesy of Montgomery County Planning

## DRIVING

The highway system includes Interstate 70 that runs northwest-southwest, connecting to I-70 in the north at Frederick, and the I-495 Capital Beltway to the south that provides access to DC and Northern Virginia. The Intercounty Connector, or ICC, runs east-west from I-95 to I-270 and has made connecting to Baltimore, Howard and Prince George's counties much easier.

## TAXIES, UBER, LYFT, AND OTHER DRIVING SERVICES

Driving services are readily available throughout Montgomery County and the greater metro area.

## MARC TRAIN AND AMTRAK ACCESS

MARC Trains provide state-wide transportation for commuters coming in and out of Montgomery County. MARC Train (<https://mta.maryland.gov/marc-train>) stops in the county include Gaithersburg, Germantown, Rockville and Silver Spring. Amtrak also has stops in the area, including a metro platform in Rockville.

## PORT OF BALTIMORE

Is a close by port if shipping is an important part of your business model and growth potential.

## CONNECT WITH US

(http://connect.us) (http://connect.us)

SIGN UP FOR OUR NEWSLETTER (/connect#newsletter)

## SILVER SPRING

ARTS &amp; ENTERTAINMENT DISTRICT

[Arts & Entertainment \(/arts-district\)](/arts-district)[\(/\)](/)[Restaurants \(/dining\)](/dining)[Transportation \(/transportation\)](/transportation)[Directions \(/directions\)](/directions)

## ARTS &amp; ENTERTAINMENT

[NOAA Weather \(/noaa\\_weather\)](/noaa_weather)

LIVE MUSIC, THEATER, INDEPENDENT FILMS AND MAJOR MOTION BLOCKBUSTERS,  
VISUAL ARTS, DANCE, AND SO MUCH MORE, THE **SILVER SPRING ARTS DISTRICT**

[Calendar of Events \(/calendar\)](/calendar)

HAS EVERYTHING YOU HAVE BEEN LOOKING FOR.

[Submit An Event \(/submit-event\)](/submit-event)

FILTER BY GROUP

[Taste the World \(/taste-the-world\)](/taste-the-world)

## ACORN PARK

1190 EAST-WEST HWY

[\(/go/acorn-park\)](/go/acorn-park)[Silver Spring Urban District \(/silver-spring-urban-district\)](/silver-spring-urban-district)[Silver Spring Regional Center \(/silver-spring-regional-center\)](/silver-spring-regional-center)[Silver Spring Civic Building \(/silver-spring-civic-building\)](/silver-spring-civic-building)[Arts & Entertainment District \(/arts-and-entertainment-district\)](/arts-and-entertainment-district)

## AFI SILVER THEATRE &amp; CULTURAL CENTER

8633 COLESVILLE RD

[\(/go/afi-silver-theatre-and-cultural-ctr\)](/go/afi-silver-theatre-and-cultural-ctr)[Community Support Links \(/community-support\)](/community-support)[News \(/news\)](/news)[Contact Us \(/contact\)](/contact)

**ALBA ROSA**  
1325 FENWICK LN

(/go/alba-rosa)

**THE ARC**  
1203 FIDLER LN

(/go/the-arc)

Search (/search)

Summer Family Entertainment (/summer-family-entertainment)

Silver Spring Jazz Festival (/silver-spring-jazz-festival)



Montgomery County Thanksgiving Parade  
(/montgomery-county-thanksgiving-parade)



**ART DECO BENCHES**  
1133 EAST-WEST HWY

(/go/art-deco-benches)

**ARTIVATE**  
8455 COLESVILLE ROAD

(/go/artivate)

**ARTS ALLEY**  
8030 GEORGIA AVE

(/go/arts-alley)

**ARTS AND HUMANITIES COUNCIL OF MC**  
801 ELLSWORTH DR

(/go/arts-and-humanities-council-of-mc)

**ARTSTREAM**  
8641 COLESVILLE RD



(/go/artstream1)

## **BEFORE AND AFTER**

901 ELLSWORTH DRIVE

(/go/before-and-after)

## **BIO WALL**

1040 SPRING ST

(/go/bio-wall)

## **BIRD HOUSES**

8616 2ND AVE

(/go/bird-houses)

## **BOTERO BALLERINAS**

8711 GEORGIA AVE

(/go/botero-ballerinas)

## **BRUSH STROKES**

933 ELLSWORTH DR

(/go/brush-strokes)

## **A BRUSHSTROKE OF DISCOVERY**

8500 COLESVILLE RD

(/go/a-brushstroke-of-discovery)

## **CATYLATOR MAKERSPACE**

8121 GEORGIA AVENUE

(/go/catylator-makerspace)

## **COASTLINE**

1301 EAST-WEST HWY

(/go/coastline)

## **COLOR ME MINE**

823 ELLSWORTH DR

(/go/color-me-mine)

## **COUSINS**

OFF EASTERN AVE AT KENNETT ST GARAGE

(/go/cousins)

## **CREATE ARTS CENTER**

816 THAYER AVE

(/go/create-arts-center)

## **CRESCENT**

930 WAYNE AVE

(/go/cresent)

## **CROSSWALK COLORS**

SPRING STREET

(/go/crosswalk-colors)

**CUNIFORM MUSIC**

FENTON ST

(/go/cuniform-music)

**DAVE AND BUSTER'S**

8661 COLESVILLE RD

(/go/dave-and-busters)

**DC SONIC CIRCUITS**

AT CUNIFORM MUSIC

(/go/dc-sonic-circuits)

**DISCOVERY COMMUNICATIONS**

ONE DISCOVERY PL

(/go/discovery-communications)

**DOCS IN PROGRESS**

801 WAYNE AVE

(/go/docs-in-progress)

**DOWNTOWN SS SHOPPING CENTER**

GEORGIA AVE & COLESVILLE RD

(/go/downtown-ss-shopping-center)

**EAST/ WEST BEACON**

1200 EAST-WEST HWY

(/go/east-west-beacon)

## **EUREKA!**

ONE DISCOVERY PLACE

(/go/eureka)

## **FEAR THE TURTLE: WISDOM OF EINSTEIN**

SPRING ST & CAMERON ST

(/go/fear-the-turtle-wisdom-of-einstein)

## **FEARLESS FLIER**

923 ELLSWORTH DR

(/go/fearless-flier)

## **FILL-UP AND RIDE**

8616 2ND AVE

(/go/fill-up-and-ride)

## **THE FILLMORE SILVER SPRING**

8656 COLESVILLE RD

(/go/the-fillmore)

## **FOGOMOTION**

8215 FENTON ST

(/go/fogomotion)

## **FOR SPACE LOVERS**

8025 13TH ST

(/go/moon-dancing)

**FORUM THEATRE**

8641 COLESVILLE RD

(/go/forum-theatre)

**FRIENDS OF THE LIBRARY BOOKSTORE**

8901 COLESVILLE RD

(/go/silver-spring-library)

**GLOBAL REFUGEE MURAL**

963 BONIFANT ST

(/go/gobal-refugee-mural)

**THE GREATER SILVER SPRING CHAMBER OF COMMERCE**

8601 GEORGIA AVE

(/go/the-greater-silver-spring-chamber-of-commerce)

**GYMBOREE PLAY AND MUSIC**

921B ELLSWORTH DR

(/go/gymboree-play-and-music)

**THE HAND**

1325 EAST-WEST HWY

(/go/the-hand)

## **HARRY TRUMAN STANDS ON EAST PLATFORM**

8100 GEORGIA AVE

(/go/harry-truman-stands-on-east-platform)

## **HIGHWOOD THEATRE**

914 SILVER SPRING AVE

(/go/highwood-theatre)

## **HISTORIC ARMORY SITE - NOW AND THEN**

925 WAYNE AVE

(/go/historic-armory-site-now-and-then)

## **IMPERIAL FINE FRAMING**

943 BONIFANT ST

(/go/imperial-fine-framing)

## **JOE'S RECORD PARADISE**

8216 GEORGIA AVE

(/go/joes-record-paradise)

## **LEVINE MUSIC**

900 WAYNE AVENUE

(/go/levine-school)

## **LIGHTWEB**

923 ELLSWORTH DR

(/go/lightweb)

**LIL SOSO PRODUCTIONS**

8001 KENNETT ST

(/go/lil-soso-productions)

**LION AND THE MOUSE**

900 WAYNE AVENUE

(/go/lion-and-the-mouse)

**LOTUS COLUMNS**

1200 BLAIR MILL RD

(/go/lotus-columns)

**LUCKY DOG FILMS**

8215C FENTON ST

(/go/lucky-dog-films)

**MARYLAND YOUTH BALLET**

926 ELLSWORTH DR

(/go/maryland-youth-ballet)

**THE MAYOR**

8221 GEORGIA AVE

(/go/the-mayor)

**MCGINTY'S PUBLIC HOUSE**

911 ELLSWORTH DR

(/go/mcgintys-public-house)

**MONTGOMERY COUNTY HISTORIC PRESERVATION COMM**

1400 SPRING ST

(/go/montgomery-county-historic-preservation-comm)

**MONTGOMERY COLLEGE BLACK BOX THEATRE**

PHILA. & CHICAGO

(/go/montcoll-at-tp-black-box-theatre)

**MONTGOMERY COLLEGE CAMPUS**

7600 TAKOMA AVE

(/go/montgomery-college-campus)

**MONTGOMERY COLLEGE CULTURAL ARTS CENTER**

7995 GEORGIA AVE

(/go/montgomery-college-cultural-arts-center)

**MONTGOMERY COLLEGE MORRIS & GWENDOLYN CAFRITZ ART CENTER**

930 KING ST

(/go/montgomery-college-morris-and-gwendolyn-cafritz-art-center)

**MONTGOMERY COUNTY HISTORIC PRESERVATION COMMISSION**

8787 GEORGIA AVE

(/go/montgomery-county-historic-preservation-commission)



SILVER SPRING

Arts & Entertainment (/arts-district)

(/)

Restaurants (/dining)



Transportation (/transportation)

Directions (/directions)

# RESTAURANTS & DINING

NOAA Weather (/noaa\_weather)

THERE ARE OVER 150 RESTAURANTS OFFERING THE GREATEST CROSS SECTION OF CUISINE IN ANY CENTRAL BUSINESS DISTRICT OF ITS SIZE. THERE IS AN AUTHENTIC IRISH BREW PUB, ETHIOPIAN CUISINE, ITALIAN FARE FROM DELI TO DRAMATIC DINING ROOM, AND SIGNATURE ELVIS BURGERS SERVED UP IN FUNKY INDUSTRIAL CHIC SPACE. AND THERE'S EVERY NUANCE ON ASIAN CUISINE FROM ONE END OF THE CONTINENT TO THE OTHER. IF YOU LOVE SWEETS AND ICE CREAM, YOU'LL GET YOUR JUST DESSERTS IN DOWNTOWN SILVER SPRING.

Calendar of Events (/calendar)

Submit An Event (/submit-event)

Taste the World (/taste-the-world)

Silver Spring Urban District (/silver-spring-urban-district)

FILTER BY GROUP

Silver Spring Regional Center (/silver-spring-regional-center)

Silver Spring Civic Building (/silver-spring-civic-building)

8407 KITCHEN BAR

8407 RAMSEY AVE

(/go/8407)

ABOL

8626 COLESVILLE RD

Arts & Entertainment District (/arts-and-entertainment-district)

Community Support Links (/community-support)

News (/news)

Contact Us (/contact)

[\(/go/abol\)](#)[Search \(/search\)](#)**ABYSSINIA ETHIOPIAN RESTAURANT**

8221 GEORGIA AVE

[Summer Family Entertainment \(/summer-family-entertainment\)](#)[Silver Spring Jazz Festival \(/silver-spring-jazz-festival\)](#)[\(/go/abyssinia-ethiopian-restaurant\)](#)[Montgomery County Thanksgiving Parade](#)[\(/montgomery-county-thanksgiving-parade\)](#)**ADDIS ABABA ETHIOPIAN RESTAURANT**

8233 FENTON ST

[\(/go/addis-ababa-ethiopian-restaurant\)](#)**ALL SET RESTAURANT & BAR**

8630 FENTON ST.

[\(/go/all-set-restaurant\)](#)**BALAGGER RESTAURANT & BAR**

8081 GEORGIA AVE

[\(/go/balagger-restaurant-and-bar\)](#)**BEN & JERRY'S ICE CREAM**

903 ELLSWORTH DR

[\(/go/ben-and-jerrys-ice-cream\)](#)**BETE ETHIOPIAN CUSINE AND CAFE**

811 ROEDER RD

[\(/go/bete-ethiopian-cusine-and-cafe\)](#)**BETESB RESTAURANT**

8201 GEORGIA AVE.

(/go/beteseb-restaurant)

**BIBIM**

923 SLIGO AVE.

(/go/bibim)

**THE BIG GREEK CAFE**

8223 GEORGIA AVE

(/go/the-big-greek-cafe)

**BLUE PEARL BUFFET & GRILL**

8661 COLESVILLE RD

(/go/blue-pearl-buffet-and-grill)

**BOMBAY GAYLORD**

8401 GEORGIA AVE

(/go/bombay-gaylord)

**BUMP 'N GRIND**

1200 EAST-WEST HWY

(/go/bump-n-grind)

**BURGERFI**

8504 FENTON ST

(/go/burgerfi)

**CAFE X-PRESS**

8714A GEORGIA AVE

(/go/cafe-x-press)

**CAVA GRILL**

8515 FENTON ST

(/go/cava-grill)

**CHARM THAI RESTAURANT**

8408 GEORGIA AVE

(/go/charm-thai-restaurant)

**CHICK-FIL-A**

825 ELLSWORTH DR

(/go/chick-fil-a)

**CHIPOTLE**

907 ELLSWORTH DR

(/go/chipotle)

**THE CLASSICS**

8606 COLESVILLE RD

(/go/the-classics)

**COLD STONE CREAMERY**

821 ELLSWORTH DR

(/go/cold-stone-creamery)

**COPPER CANYON GRILL**

928 ELLSWORTH DR

(/go/copper-canyon-grill)

**CRISFIELD SEAFOOD RESTAURANT**

8012 GEORGIA AVE

(/go/crisfield-seafood-restaurant)

**CRISP & JUICY**

1314 EAST-WEST HWY

(/go/crisp-and-juicy)

**CUBANO'S**

1201 FIDLER LN

(/go/cubanos-restaurant)

**DA MARCO RISTORANTE ITALIANO**

8662 COLESVILLE RD

(/go/da-marco-ristorante-italiano)

**DAVID'S CAFE**

1300 SPRING ST

(/go/davids-cafe)

**DENIZENS BREWING COMPANY**

1115 EAST-WEST HWY

(/go/denizens-brewing-company)

**DRAGON CITY**

918 SLIGO AVE

(/go/dragon-city)

**ECOLOGY HEALTH FOOD**

904 BONIFANT ST

(/go/ecology-health-food1)

**EGGSPECTATION**

923 ELLSWORTH DR

(/go/eggspectation-restaurant)

**EINSTEIN BROS. BAGELS**

8397 COLESVILLE RD

(/go/einstein-bros-bagels)

**ETHIO EXPRESS GRILL**

952 SLIGO AVE

(/go/ethio-express-grill)

**FARFINA ISLAND**

8123 GEORGIA AVE

(/go/farfina-island)

**FENTON CAFE**

8311 FENTON ST

(/go/fenton-cafe)

**FIRE STATION 1 RESTAURANT**

8131 GEORGIA AVE

(/go/fire-station-1)

**FLIPPIN' PIZZA**

8517 COLESVILLE RD

(/go/flippin-pizza)

**FRIENDS DELI**

1010 WAYNE AVE

(/go/friends-deli)

**FUDDRUCKERS**

819 ELLSWORTH DR

(/go/fuddruckers)

**GEBETA ETHIOPIAN RESTAURANT**

8123 GEORGIA AVE

(/go/gebeta-ethiopian-restaurant)

**G HAR-E-KABAB**

944 WAYNE AVE

(/go/ghar-e-kabab)

**GOLDEN HOUSE**

8200 GEORGIA AVE

(/go/golden-house)

**GOLF ULTRA LOUNGE/AFRIK GRILL**

8123 GEORGIA AVE

(/go/golf-ultra-lounge-and-afrik-grill)

**THE GREEK PLACE**

8417 GEORGIA AVE

(/go/the-greek)

**GUSTO FARM TO STREET**

8512 FENTON ST.

(/go/gusto-farm-to-street)

**HEN QUARTER**

919 ELLSWORTH DR

(/go/hen-quarter)

**IKKO SUSHI**

1215 EAST-WEST HWY

(/go/pomegranate-cafe)

**J & J DELI**



8701 GEORGIA AVE

(/go/j-and-j-deli)

**JIMMY JOHN'S**

8710 CAMERON ST

(/go/jimmy-johns)

**KALDI'S COFFEE BAR**

918 SILVER SPRING AVE

(/go/kaldis-coffee-bar)

**KAO THAI**

8650 COLESVILLE RD

(/go/silver-spring-thai-flavor)

**KEFA CAFÉ**

963 BONIFANT ST

(/go/kefa-cafe)

**KITCHEN THAI RESTUARANT**

8624 COLESVILLE RD

(/go/kitchen-thai)

**LA BAMBA**

8241 GEORGIA AVE

(/go/la-bamba)

**LA FONDA PAISA BAKERY**

7914 GEORGIA AVE

(/go/la-fonda-paisa-bakery)

**LA MALINCHE RESTAURANT**

8622 COLESVILLE RD

(/go/la-malinche-restaurante)

**LACO MELZA ETHIO CAFE**

7912 GEORGIA AVE

(/go/laco-melza-ethio-cafe)

**LANGANO ETHIOPIAN RESTAURANT**

8305 GEORGIA AVE

(/go/langano-ethiopian-restaurant)

**LEBANESE TAVERNA CAFE**

933 ELLSWORTH DR

(/go/lebanese-taverna-cafe)

**LENOX BEER WINE & DELI**

1400-A EAST-WEST HWY

(/go/lenox-beer-wine-and-deli)

**LESAAC ETHIOPIAN CAFE**

8200 FENTON ST

(/go/lesaac-ethiopian-cafe)

**LINA'S DINER AND BAR**

8402 GEORGIA AVE

(/go/linas-diner-and-bar)

**LINCOLN'S BAR-B-QUE**

931 ELLSWORTH DR.

(/go/lincolns-bbq)

**LOTUS CAFE**

8077 GEORGIA AVE

(/go/lotus-cafe)

**LUCY ETHIOPIAN RESTAURANT**

8301 GEORGIA AVE

(/go/lucy-ethiopian-restaurant)

**MAMMA LUCIA**

1302 EAST-WEST HWY

(/go/mamma-lucia)

**MANDALAY RESTAURANT**

930 BONIFANT ST

(/go/mandalay-restaurant)

**MANDARIN RESTAURANT**

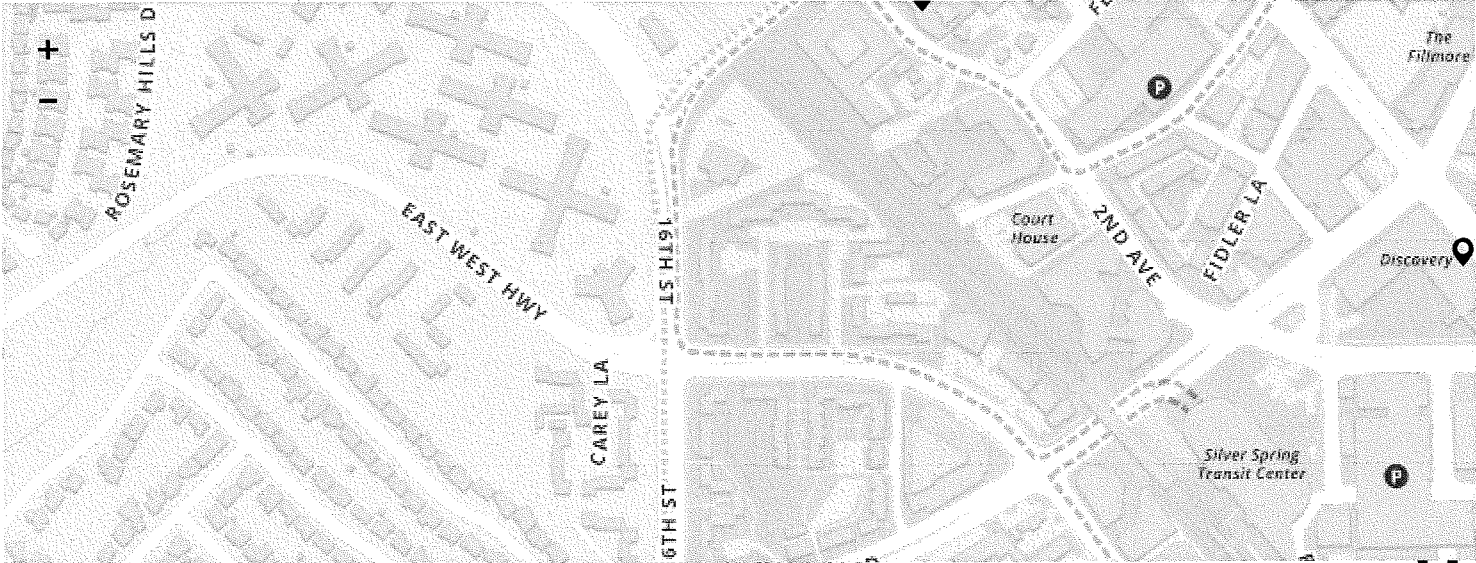
SILVER SPRING

ARTS & ENTERTAINMENT DISTRICT

(/)

Arts & Entertainment (/arts-district)

Restaurants (/dining)



transportation (/transportation)

SUMMER FAMILY ENTERTAINMENT

Directions (/directions)

NOAA Weather (/noaa\_weather)

FOR PARENTS, SUMMER BREAK CAN SEEM ENDLESS. PLAN A FREE OR LOW COST TRIP INTO SILVER SPRING TO ENTERTAIN

Calendar of Events (/calendar)

THE KIDS

Submit An Event (/submit-event)

Taste the World (/taste-the-world)

Silver Spring Urban District (/silver-spring-urban-district)

Silver Spring Regional Center (/silver-spring-regional-center)

Silver Spring Civic Building (/silver-spring-civic-building)

Arts & Entertainment District (/arts-and-entertainment-district)

Community Support Links (/community-support)

News (/news)

Contact Us (/contact)



## FILL-UP AND RIDE (/GO/FILL-UP-AND-RIDE)

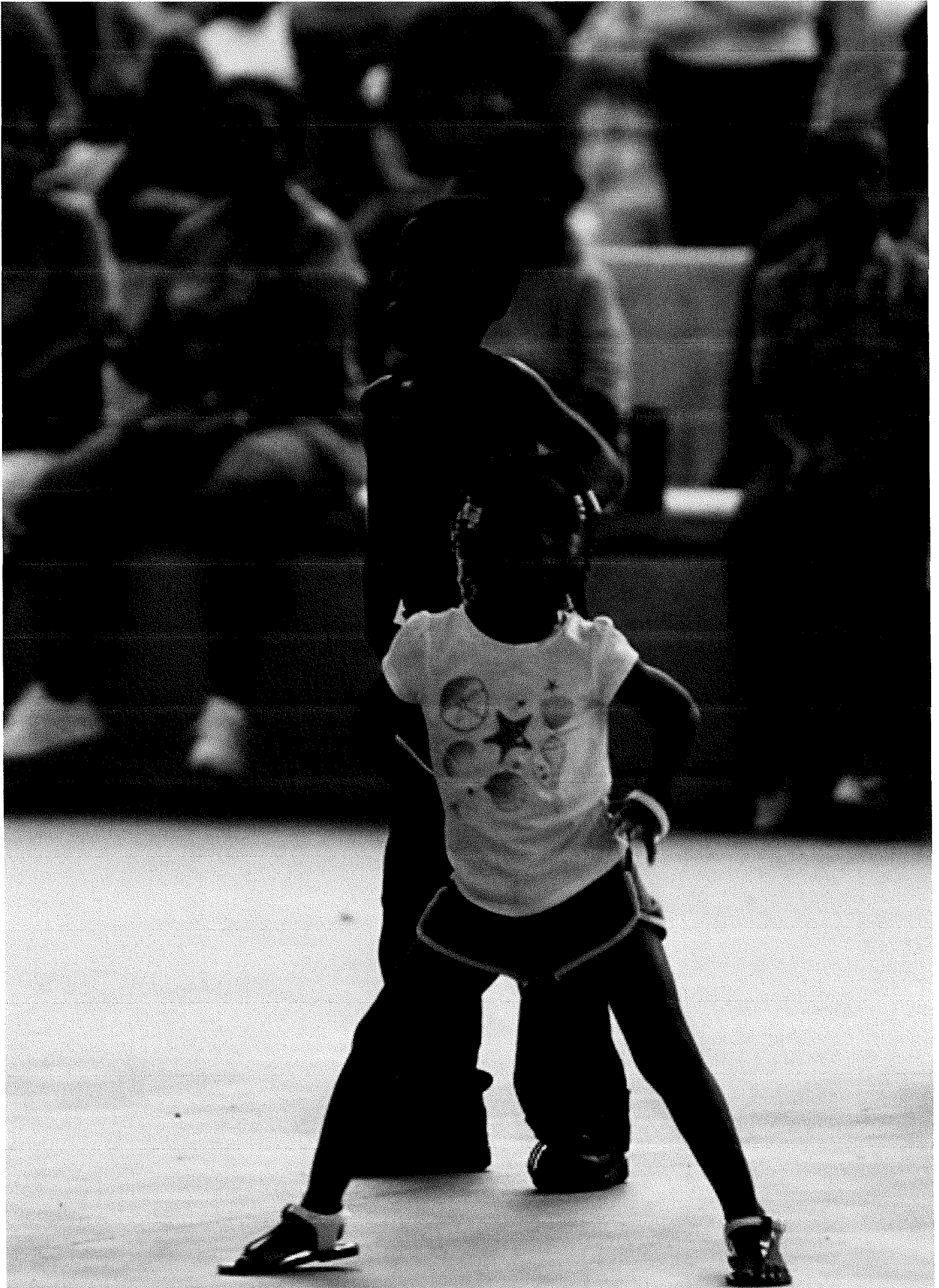
Fill up your water bottles in the courtyard outside of The Fenwick apartment building and take a bike ride on the nearby Capital Crescent Trail. The Fenwick's visitor friendly outdoor space is a public amenity which features moveable bird housed by artist Margaret Boozer and a neat water filling station for bikers.

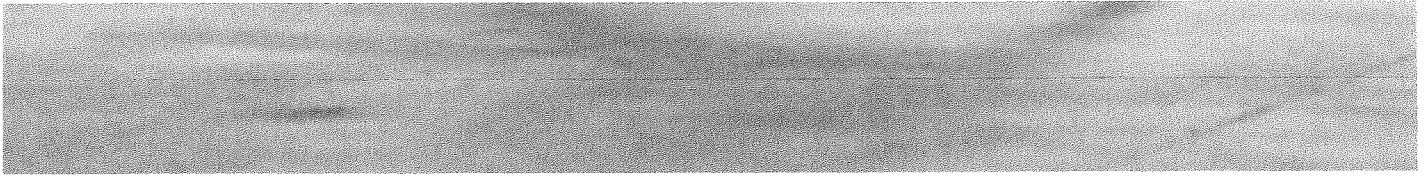


(/GO/FILL-UP-AND-RIDE)

FILL-UP AND RIDE (/GO/FILL-UP-AND-RIDE)

8616 2ND AVE (/GO/FILL-UP-AND-RIDE)





## KIDS GAMES AT THE SILVER SPRING SUMMER CONCERTS (/GO/KIDS-GAMES-AT-THE-SILVER-SPRING-SUMMER-CONCERTS)

From late June – early August, Silver Spring hosts free kids games and a family raffle at the Thursday night Summer Concerts on Veterans Plaza. Parents can relax to some great tunes while the kids work off their energy.



(/GO/KIDS-GAMES-AT-THE-SILVER-SPRING-SUMMER-CONCERTS)

KIDS GAMES AT THE SILVER SPRING SUMMER CONCERTS (/GO/KIDS-GAMES-AT-THE-SILVER-SPRING-SUMMER-CONCERTS)

ONE VETERANS PL (/GO/KIDS-GAMES-AT-THE-SILVER-SPRING-SUMMER-CONCERTS)



## STREET PERFORMANCES (/GO/STREET-PERFORMANCES)

Silver Spring often has buskers performing on street corners throughout the Arts and Entertainment District. Family friendly children's entertainment can often be found at the Saturday morning farmers market on Ellsworth Drive.





(/GO/STREET-PERFORMANCES)

STREET PERFORMANCES (/GO/STREET-PERFORMANCES)

ELLSWORTH DR (/GO/STREET-PERFORMANCES)



## DANCE THE NIGHT AWAY (/GO/DANCE-THE-NIGHT-AWAY)

The running man, the moonwalk or the robot...Friday night concerts at Silver Plaza are a great way for parents to show their kids their smooth dance moves.

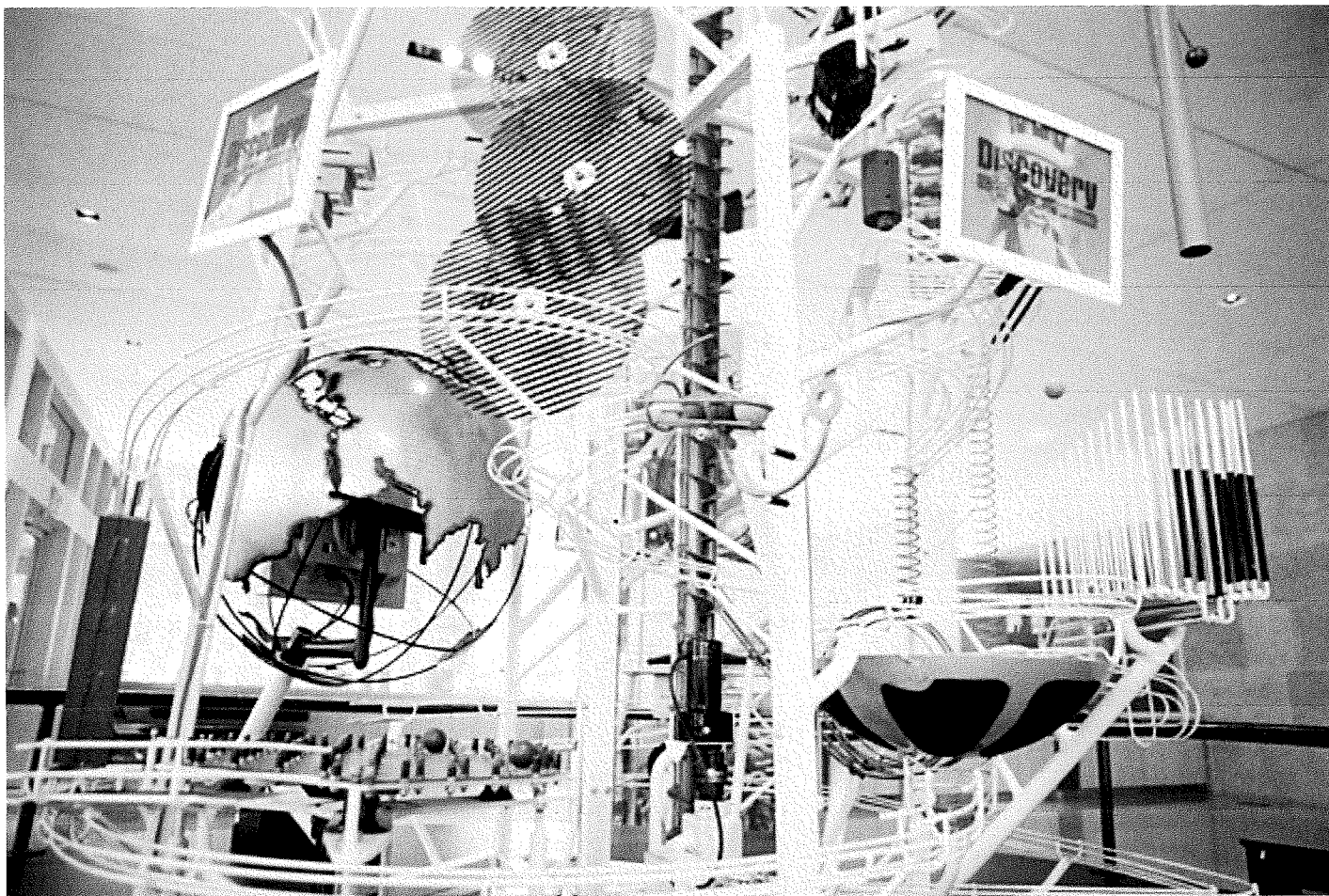


(/GO/DANCE-THE-NIGHT-AWAY)

DANCE THE NIGHT AWAY (/GO/DANCE-THE-NIGHT-AWAY)

ELLSWORTH DR (/GO/DANCE-THE-NIGHT-AWAY)





## EUREKA! (/GO/EUREKA)

The Discovery Communications lobby also boasts an audio kinetic ball machine by George Rhoades. This Rube Goldberg-like contraption has bouncing balls, ringing bells, moving gorillas, video screens, and whirl-i-gigs galore. Kids will love the weirdness and parents can't help but track the progress of the machine. It is a sensory overload that is worth the trip. Visitors must sign in at the front desk for admittance.



(/GO/EUREKA)

EUREKA! (/GO/EUREKA)

ONE DISCOVERY PLACE (/GO/EUREKA)

## **EXHIBIT J**

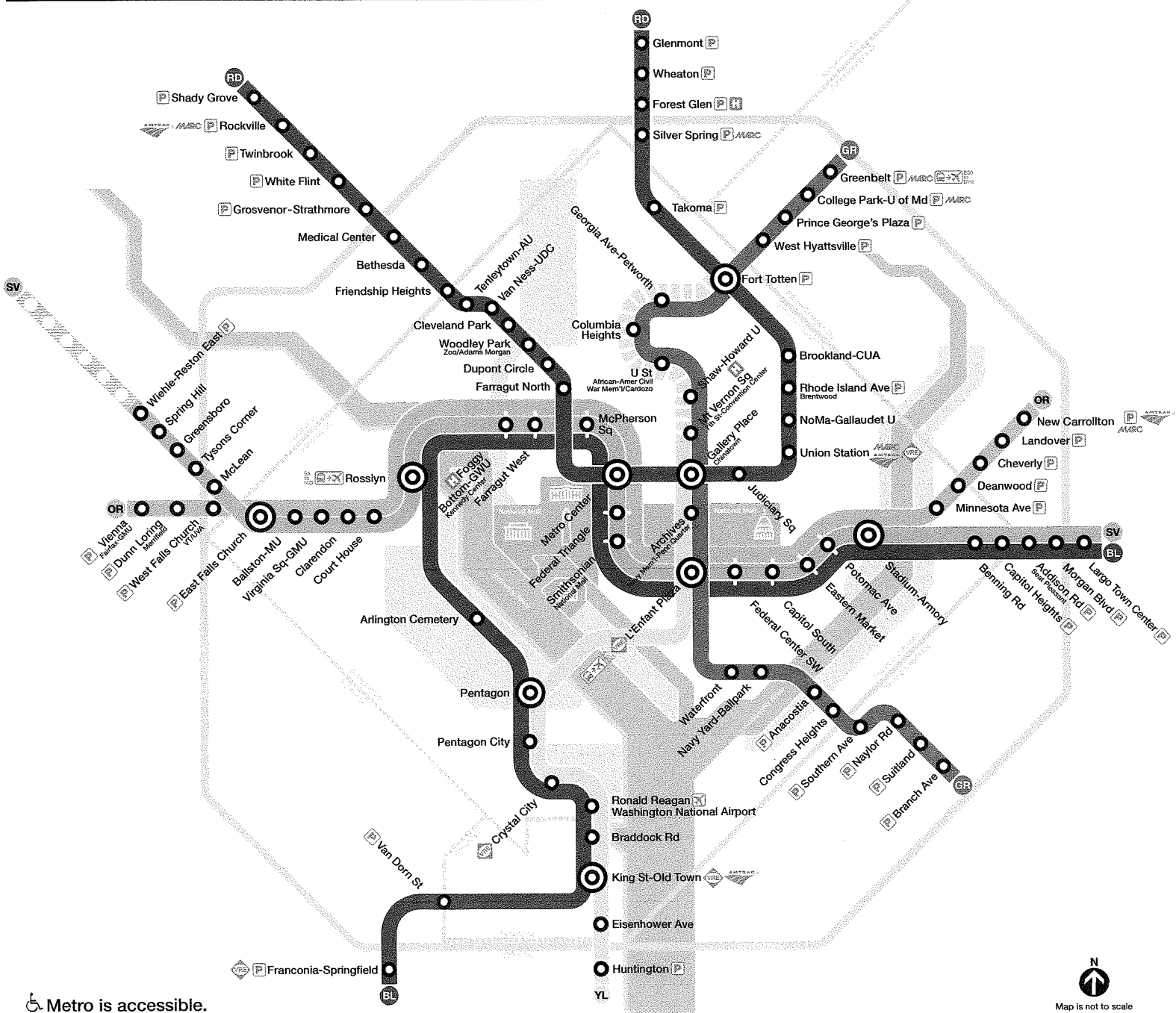
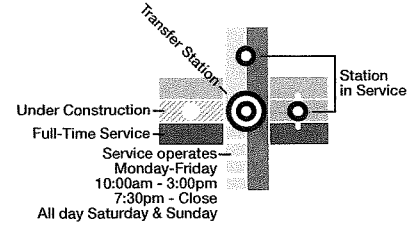
# Metro System Map

wmata.com  
Customer Information Service: 202-637-7000  
TTY Phone: 202-962-2033  
Metro Transit Police: 202-962-2121

- ## Legend
- RD** Red Line • Glenmont / Shady Grove
  - OR** Orange Line • New Carrollton / Vienna
  - BL** Blue Line • Franconia-Springfield / Largo Town Center
  - GR** Green Line • Branch Ave / Greenbelt
  - YL** Yellow Line • Huntington / Mt Vernon Sq / Fort Totten
  - SV** Silver Line • Wiehle-Reston East / Largo Town Center

- ## Station Features
- Bus to Airport
  - Parking
  - Hospital
  - Airport

- ## Connecting Rail Systems
- AMTRAK
  - VRE
  - MARC



Metro is accessible.

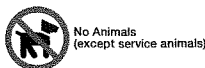
WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY © 2017



No Smoking



No Eating or Drinking



No Animals (except service animals)



No Audio (without earphones)

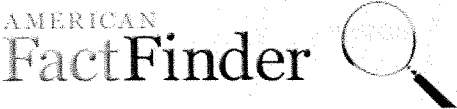


No Littering or Spitting



No Dangerous or Flammable Items

## **EXHIBIT K**



S0801

COMMUTING CHARACTERISTICS BY SEX

2011-2015 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

**Tell us what you think.** Provide feedback to help make American Community Survey data more useful for you.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Subject	Silver Spring CDP, Maryland				
	Total		Male		Female
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate
Workers 16 years and over	44,103	+/-1,223	23,009	+/-980	21,094
MEANS OF TRANSPORTATION TO WORK					
Car, truck, or van	61.7%	+/-1.8	66.1%	+/-2.3	56.8%
Drove alone	51.6%	+/-2.0	53.5%	+/-2.6	49.5%
Carpooled	10.1%	+/-1.5	12.7%	+/-2.3	7.3%
In 2-person carpool	6.3%	+/-1.2	6.7%	+/-1.6	5.9%
In 3-person carpool	1.8%	+/-0.6	2.7%	+/-1.2	0.8%
In 4-or-more person carpool	2.0%	+/-0.8	3.3%	+/-1.3	0.6%
Workers per car, truck, or van	1.11	+/-0.02	1.13	+/-0.03	1.07
Public transportation (excluding taxicab)	29.1%	+/-1.6	24.6%	+/-2.1	34.0%
Walked	3.2%	+/-0.6	3.3%	+/-0.8	3.1%
Bicycle	0.6%	+/-0.3	1.0%	+/-0.5	0.3%
Taxicab, motorcycle, or other means	1.0%	+/-0.3	1.3%	+/-0.5	0.7%
Worked at home	4.4%	+/-0.7	3.8%	+/-0.9	5.0%
PLACE OF WORK					
Worked in state of residence	57.3%	+/-1.8	58.6%	+/-2.5	55.9%
Worked in county of residence	40.9%	+/-1.7	38.8%	+/-2.5	43.2%
Worked outside county of residence	16.4%	+/-1.4	19.8%	+/-2.1	12.7%
Worked outside state of residence	42.7%	+/-1.8	41.4%	+/-2.5	44.1%
Living in a place					
100.0%	100.0%	+/-0.1	100.0%	+/-0.1	100.0%
Worked in place of residence	14.9%	+/-1.2	13.3%	+/-1.8	16.7%
Worked outside place of residence	85.1%	+/-1.2	86.7%	+/-1.8	83.3%
Not living in a place	0.0%	+/-0.1	0.0%	+/-0.1	0.0%
Living in 12 selected states					
0.0%	0.0%	+/-0.1	0.0%	+/-0.1	0.0%
Worked in minor civil division of residence	0.0%	+/-0.1	0.0%	+/-0.1	0.0%
Worked outside minor civil division of residence	0.0%	+/-0.1	0.0%	+/-0.1	0.0%
Not living in 12 selected states	100.0%	+/-0.1	100.0%	+/-0.1	100.0%

Subject	Silver Spring CDP, Maryland				
	Total		Male		Female
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate
Workers 16 years and over who did not work at home	42,170	+/-1,238	22,131	+/-1,030	20,039
TIME LEAVING HOME TO GO TO WORK					
12:00 a.m. to 4:59 a.m.	2.7%	+/-0.7	3.5%	+/-1.1	1.9%
5:00 a.m. to 5:29 a.m.	2.9%	+/-0.5	4.0%	+/-0.9	1.6%
5:30 a.m. to 5:59 a.m.	3.6%	+/-0.9	5.1%	+/-1.4	2.0%
6:00 a.m. to 6:29 a.m.	8.5%	+/-1.3	10.5%	+/-1.9	6.3%
6:30 a.m. to 6:59 a.m.	8.2%	+/-1.1	8.0%	+/-1.3	8.4%
7:00 a.m. to 7:29 a.m.	14.0%	+/-1.3	14.1%	+/-1.7	13.9%
7:30 a.m. to 7:59 a.m.	11.5%	+/-1.0	11.2%	+/-1.4	11.7%
8:00 a.m. to 8:29 a.m.	16.4%	+/-1.5	13.5%	+/-1.8	19.5%
8:30 a.m. to 8:59 a.m.	9.5%	+/-1.2	7.3%	+/-1.6	12.0%
9:00 a.m. to 11:59 p.m.	22.7%	+/-1.8	22.9%	+/-2.5	22.5%
TRAVEL TIME TO WORK					
Less than 10 minutes	4.1%	+/-0.8	3.9%	+/-0.9	4.4%
10 to 14 minutes	5.3%	+/-0.9	4.9%	+/-1.4	5.9%
15 to 19 minutes	8.8%	+/-1.2	8.1%	+/-1.4	9.4%
20 to 24 minutes	12.3%	+/-1.2	13.9%	+/-1.7	10.6%
25 to 29 minutes	6.9%	+/-0.9	7.2%	+/-1.2	6.7%
30 to 34 minutes	19.4%	+/-1.4	20.0%	+/-2.1	18.8%
35 to 44 minutes	14.4%	+/-1.4	14.9%	+/-2.0	14.0%
45 to 59 minutes	15.6%	+/-1.4	15.2%	+/-1.8	16.0%
60 or more minutes	13.1%	+/-1.3	12.0%	+/-1.7	14.2%
Mean travel time to work (minutes)	34.3	+/-1.0	34.0	+/-1.3	34.5
VEHICLES AVAILABLE					
Workers 16 years and over in households	44,026	+/-1,226	22,934	+/-985	21,092
No vehicle available	10.3%	+/-1.6	9.3%	+/-1.9	11.3%
1 vehicle available	38.0%	+/-2.2	36.2%	+/-2.8	40.0%
2 vehicles available	35.4%	+/-2.3	36.3%	+/-2.8	34.5%
3 or more vehicles available	16.3%	+/-2.0	18.3%	+/-2.5	14.1%
PERCENT IMPUTED					
Means of transportation to work	6.4%	(X)	(X)	(X)	(X)
Private vehicle occupancy	7.8%	(X)	(X)	(X)	(X)
Place of work	10.0%	(X)	(X)	(X)	(X)
Time leaving home to go to work	12.6%	(X)	(X)	(X)	(X)
Travel time to work	11.3%	(X)	(X)	(X)	(X)
Vehicles available	0.7%	(X)	(X)	(X)	(X)

**CERTIFICATE OF SERVICE**

I, Barry A. Friedman, hereby certify that I have served on this 7th day of November, 2017, a copy of the foregoing **Petition for Special Relief** on the following parties by first-class mail, postage pre-paid:

Mr. Michael Nissenblatt  
Senior Vice President, Broadcaster Relations  
Comcast Cable  
One Comcast Center  
1701 John F. Kennedy Boulevard  
Philadelphia, Pennsylvania 19103-2838

Mr. Christopher G. Tygh  
Vice President, Content Acquisition  
Cox Communications, Inc.  
6205-B Peachtree-Dunwoody Road  
Atlanta, Georgia 30328

Verizon Virginia LLC  
Suite 400W  
1300 I Street, NW  
Washington, D.C. 20005

RCN Corporation  
10000 Derekwood Lane  
Lanham, Maryland 20706

Fox Television Stations LLC  
Suite 890  
400 North Capitol Street, NW  
Washington, D.C. 20001

WDCW LLC  
Suite 350  
2121 Wisconsin Avenue, NW  
Washington, D.C. 20007

ACC Licensee LLC  
c/o Pillsbury Winthrop Shaw Pittman  
1200 17th Street, NW  
Washington, D.C. 20036

**CERTIFICATE OF SERVICE**

I, Barry A. Friedman, hereby certify that I have served on this 6th day of November, 2017, a copy of the foregoing **Petition for Special Relief** on the following parties by first-class mail, postage pre-paid:

Mr. Michael Nissenblatt  
Senior Vice President, Broadcaster Relations  
Comcast Cable  
One Comcast Center  
1701 John F. Kennedy Boulevard  
Philadelphia, Pennsylvania 19103-2838

Mr. Christopher G. Tygh  
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6205-B Peachtree-Dunwoody Road  
Atlanta, Georgia 30328

Verizon Virginia LLC  
Suite 400W  
1300 I Street, NW  
Washington, D.C. 20005

RCN Corporation  
10000 Derekwood Lane  
Lanham, Maryland 20706

Fox Television Stations LLC  
Suite 890  
400 North Capitol Street, NW  
Washington, D.C. 20001

WDCW LLC  
Suite 350  
2121 Wisconsin Avenue, NW  
Washington, D.C. 20007

ACC Licensee LLC  
c/o Pillsbury Winthrop Shaw Pittman  
1200 17th Street, NW  
Washington, D.C. 20036



NBC Telemundo License LLC  
c/o NBCUniversal LLCC  
9th Floor  
1299 Pennsylvania Avenue, NW  
Washington, D.C. 20004

WUSA-TV Inc.  
c/o Tegna, Inc.  
7950 Jones Branch Drive  
McLean, Virginia 22107  
Washington Educational Telecommunications  
Association Inc.  
2775 South Quincy Boulevard  
Arlington, Virginia 22206

Unimas D.C. LLC  
Suite 4083  
5999 Center Drive  
Los Angeles, California 90045

Howard University  
2222 4th Street, NW  
Washington, D.C. 20059

ION Media Washington License, Inc.  
601 Clearwater Park Road  
West Palm Beach, Florida 33401

Western Pacific Broadcast LLC  
Suite 2500  
400 North Ashley Drive  
Tampa, Florida 33602

SVP – Programming Acquisitions  
DIRECTV, LLC  
2230 East Imperial Highway  
El Segundo, California 90245

DSIH Network, LLC  
9601 S. Meridian Boulevard  
Englewood, Colorado 80112

District of Columbia  
Office of Cable TV and Telecommunications  
2217 14th Street, N.W.  
Washington, DC 20009

Office of Cable Communications  
Montgomery County Government  
100 Maryland Avenue  
Rockville, MD 20850

Prince George's County Cable  
Television Commission  
14741 Governor Oden Bowie Drive  
Upper Marlboro, MD 20772

Administrator  
Calvert County Government  
175 Main Street  
Prince Frederick MD 20678

Administrator  
Charles County Government  
P.O. Box 2150  
LaPlata, MD 20646

County Administrator  
St. Mary's County Government  
P.O. Box 653  
Leonardstown, MD 20650

Cable Administrator  
Office of Technology Services  
Arlington County Government  
2100 Clarendon Boulevard  
Arlington, VA 22201

Office of Consumer Affairs  
City of Alexandria Government  
City Hall  
Alexandria, VA 22314

Department of Cable and Consumer Service  
Fairfax County Government  
12000 Government Center Parkway  
Fairfax, VA 22035

Department of Information Technology  
Loudoun County Government  
41975 Loudoun Center Plaza SE  
Leesburg, VA 20175

Cable Television Coordinator  
Prince William County Government  
One County Complex Court  
Woodbridge, VA 22192

Telecommunications Commission  
Stafford County Government  
1300 Courthouse Road  
Stafford, VA 22554

Cable Television and Telecommunications  
Commission  
Spotsylvania County Government  
P.O. Box 865  
Spotsylvania, VA 22553



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Barry A. Friedman